Case 18-2868, Document 283, 08/09/2019, 2628241, Page1 of 883
EXHIBIT 1
(Filed Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

----x

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----x

June 1, 2016 9:12 a.m.

CONFIDENTIAL

Deposition of JOHN ALESSI, pursuant to notice, taken by Plaintiff, at the offices of Boies Schiller & Flexner, 401
Las Olas Boulevard, Fort Lauderdale, Florida, before Kelli Ann Willis, a Registered
Professional Reporter, Certified Realtime
Reporter and Notary Public within and for the State of Florida.



	Page 9
1	JOHN ALESSI
2	Q. You're ready to start, correct?
3	A. Yes.
4	Q. Can you tell us your current address?
5	A. Boynton Beach,
6	Florida 33472.
7	Q. And your date of birth?
8	A
9	Q. And was there a time when you worked for a
10	man named Jeffrey Epstein?
11	A. Yes.
12	Q. And can you tell us when you began working
13	for Mr. Epstein?
14	A. I began working for Mr. Epstein part-time.
15	I cannot exactly tell you the date, but it was
16	1990/'91, probably. I worked a total of 13 years
17	for him.
18	Q. Okay. So you began in 1990 part-time,
19	correct?
20	A. Right.
21	Q. And you stopped working for him when?
22	A. I stopped working for him on
23	December 31st, 2001. I was out yes, 2001.
24	Q. Okay.
25	The end of 2001 I left the last day of



- 1 JOHN ALESSI
- 2 the year.
- Q. Okay. I know that it's been a long time.
- 4 A. It's been a long time.
- 5 Q. I know. So I'm going to ask that you
- 6 refer to the statement that you provided to the
- 7 police November 21st, 2005, and please go to page 5.
- 8 I just want you to start reading at line 2 and 3,
- 9 and tell me if that refreshes your recollection as
- 10 to your time or duration of employment.
- 11 A. You're right. It was 2002, then. 2002.
- 12 Q. So sometime in 1990, you were a part-time
- 13 employee?
- A. Uh-huh.
- 15 O. And you worked until December 31st, 2002;
- 16 is that right?
- 17 A. Yes.
- 18 Q. Okay. And is it also correct that you
- 19 began full-time employment with Mr. Epstein on
- 20 January 1st, 1991, as stated in that report?
- 21 A. Yes.
- Q. Prior to 1990, who did you work for?
- A. Prior to 1990, I had a company, a
- 24 maintenance company, myself, my own company, Alessi
- 25 Maintenance. And before that, I worked for another



	Page 1:
1	JOHN ALESSI
2	family, the Radi family in Palm Beach.
3	Q. Did you ever work for a man named Les
4	Wexner?
5	A. I did some work for him in his mother's
6	house.
7	Q. Where was that?
8	A. Palm Beach. What year? Before before
9	I came to work for Jeffrey.
10	Q. Is that who recommended that you work for
11	Jeffrey Epstein?
12	A. I guess so.
13	Q. Okay. When you started with Jeffrey
14	Epstein, what were your job duties?
15	A. I was doing maintenance. I was doing
16	building and rebuilding and maintenance work
17	basically. Because he just bought the house at that
18	time. And because of Mr. Wechsler knowing me, they
19	recommend me to go to the house and take a look at
20	the house. And we start tearing the house down,
21	basically, at the beginning of my job.
22	Q. Did you assist in the teardown?
23	A. Yes.
24	Q. Okay. So your job duties then was that of



25

a maintenance?

	Page 12
1	JOHN ALESSI
2	A. Maintenance, building.
3	Q. Got it.
4	And did you meet Mr. Epstein when you
5	were in 1990?
6	A. Yes, I met him.
7	Q. Okay. And in 1991, who made the decision
8	for you to become a full-time employee?
9	A. Jeffrey.
10	Q. And as a full-time employee initially,
11	what was your job?
12	A. I was basically maintenance, the same
13	thing as I was doing with I was exclusively
14	working for him. I was full-time working for him as
15	maintenance, because the house was still on
16	renovation, and he wanted me there.
17	Q. Okay. And how was your relationship with
18	Mr. Epstein back then, 1991?
19	A. Great. No problem.
20	Q. It was good?
21	A. It was good.
22	Q. Did he have a girlfriend back then, in
23	1991?
24	MR. PAGLIUSCA: Object to the form and
25	foundation



	Page 13
1	JOHN ALESSI
2	You can answer the question.
3	Occasionally, I'll need to object for the
4	record in case we need to have a discussion
5	about this with the judge. And so that's just
6	me preserving those objections.
7	THE WITNESS: Yes, he had a girlfriend.
8	Her name was Dr. Andersson, Eva Andersson. And
9	she was there just for a few months after I
10	came to the house.
11	BY MR. EDWARDS:
12	Q. And how was your relationship with
13	Dr. Andersson?
14	A. Fine.
15	Q. Okay. And at the time when Mr. Epstein
16	was at the time when Dr. Andersson was Jeffrey
17	Epstein's girlfriend, did you see any other female
18	companions around the house?
19	A. Eventually they have a lot of guests,
20	too. They did have guests coming in. But I can't
21	remember exactly who. It's a socialite. So they
22	have friends.
23	Q. At the time when Dr. Andersson was
24	Mr. Epstein's girlfriend, was Mr. Epstein getting
25	massages?



	Page 14
1	JOHN ALESSI
2	MR. PAGLIUSCA: Object to the form and
3	foundation.
4	THE WITNESS: I think so. I was not
5	involved in the house, inside of the house that
6	much. But they always got massages. Always.
7	BY MR. EDWARDS:
8	Q. Okay. I'm talking about the time period
9	when Dr. Andersson was there.
10	A. Yes, they got massages.
11	Q. Okay. So do you remember other female
12	visitors when Dr. Andersson was Mr. Epstein's
13	girlfriend?
14	A. I don't remember. I remember people being
15	there, visitors, but I cannot remember that far.
16	Q. Okay. After did there come a point in
17	time when Dr. Andersson was no longer Mr. Epstein's
18	girlfriend?
19	A. Right.
20	Q. Yes?
21	A. Yes.
22	Q. And did he did he have a new
23	girlfriend?
24	MR. PAGLIUSCA: Object to form and
25	foundation



	Page 23
1	JOHN ALESSI
2	Q. All right.
3	Who was in charge of the Palm Beach house?
4	A. I was.
5	Q. All right.
6	Who was your direct supervisor?
7	A. Mr. Epstein. He would deal with me
8	directly, or if he was not available, Ms. Maxwell.
9	Q. Okay. I want you to go to Exhibit 3 and
10	page page 179, line 8.
11	A. Line 8, "QUESTION: And then Maxwell came
12	and she took over you as your immediate supervisor?
13	Yes. That's correct. Yes. She became
14	the supervisor not only for this house, but for all
15	the homes.
16	Q. Okay. So your immediate supervisor was
17	Ms. Maxwell?
18	A. Ms. Maxwell. But if Mr. Epstein was at
19	the house, I would never go to Ms. Maxwell; I would
20	go to him directly, or he would come to me.
21	Q. Okay. At some point in time towards the
22	end of your tenure, did you come to resent
23	Ms. Maxwell?
24	MR. PAGLIUSCA: Object to the form and
25	foundation



	Page 28
1	JOHN ALESSI
2	Q. And where did the massage therapists
3	where did they come from?
4	A. Most, they came from Palm Beach. Palm
5	Beach County.
6	Q. And over the course of that 10-year period
7	of time while Ms. Maxwell was at the house, do you
8	have an approximation as to the number of different
9	females females that you were told were massage
10	therapists that came to the house?
11	MR. PAGLIUSCA: Object to form and
12	foundation.
13	THE WITNESS: I cannot give you a number,
14	but I would say probably over 100 in my stay
15	there.
16	BY MR. EDWARDS:
17	Q. And many of the times would the females
18	come only one time and not return?
19	MR. PAGLIUSCA: Object to form and
20	foundation.
21	BY MR. EDWARDS:
22	Q. Let me ask that a different way.
23	Were there times when some of these
24	females that would come to the house, and you were
25	told that they were massage therapists, would come



Page 30 1 JOHN ALESSI 2 BY MR. EDWARDS: 3 Q. Okay. And who would find the massage 4 therapist to bring to the house? 5 Α. They would call me in my office, and they would say, Get me a massage at 10:00 with this 7 person. 8 I have a list of the massage therapists, a 9 Rolodex, or a card, and I would call them for the 10 specific time they want a massage. And I would do 11 that. 12 I don't think I asked the right -- the question that I was looking to ask, so let me go 13 14 back. Did you go out looking for the girls --15 No. 16 Α. 17 -- to bring --O. 18 Α. Never. 19 -- as the massage therapists? Ο. 20 Α. Never. Who did? 21 Ο. 22 Ms. Maxwell, Mr. Epstein and their Α. friends, because their friends relayed to other 23 friends they knew a massage therapist and they would 24 25 send to the house. So it was referrals.



	Page 34
1	JOHN ALESSI
2	foundation. Hold on. That misstates what is
3	happening in this deposition, because the word
4	"recruit" was introduced by the lawyers in this
5	deposition. So I object to your
6	characterization of the testimony.
7	BY MR. EDWARDS:
8	Q. I'll read for you the question and the
9	answer.
10	The question was: "QUESTION: When did
11	that role get transferred from you to Ms. Maxwell,
12	the role of looking after girls or calling the
13	girls?
14	"ANSWER: I didn't look after out for
15	girls. Ms. Maxwell was the one that recruit. I
16	remember one occasion or two occasions she would say
17	to me, John, give me a list of all the spas in Palm
18	Beach County, and I will drive her from one to the
19	other to PGA in Boca; and she would go in and drop
20	credit cards not credit cards but business cards,
21	and she would come out. And then we'd go to she
22	will recruit the girls. Was never, never done by me
23	or Mr. Epstein or anyone else that I know of."
24	Is that truthful testimony?
25	A It is truthful; however, I think



	Page 3
1	JOHN ALESSI
2	"recruiting," for myself, for my point of view, is
3	hiring immediately and recruit the person.
4	I think she was looking for massage
5	therapists. She was looking for the best kind. She
6	went and you're right, I went one time with her,
7	or twice maybe, to different spas and different
8	clubs, great clubs, I mean, in Boca, in Fort
9	Lauderdale, in in Palm Beach. She was looking
10	for the best massage therapists available.
11	How she find these girls, I don't know. I
12	just drove there. I just was the driver. I never
13	was involved with any of the offerings or
14	negotiations or meeting these girls. Never.
15	Q. Okay. Ms. Maxwell was the one that would
16	meet the girls?
17	A. Yeah.
18	Q. Okay. Did you ever check any of the IDs
19	for any of these girls?
20	A. I was not that was not in my everyday
21	things to do. It was not.
22	Q. That was just not part of your job?
23	A. That was not my job.
24	Q. Did Ms. Maxwell take photographs while she



was at the Palm Beach house?

25

	Page 52
1	JOHN ALESSI
2	MR. PAGLIUSCA: Object to form and
3	foundation.
4	THE WITNESS: Himself. Himself.
5	BY MR. EDWARDS:
6	Q. And you do not know the ages of the
7	various massagists, right?
8	A. No.
9	Q. Did you have occasion to clean up after
10	the massages?
11	A. Yes.
12	Q. Okay. And that is after both a massage
13	for Jeffrey Epstein, as well as clean up after a
14	massage that Ghislaine Maxwell may have received?
15	A. Yes.
16	Q. And on occasion, after in cleaning up
17	after a massage of Jeffrey Epstein or Ghislaine
18	Maxwell, did you have occasion to find vibrators or
19	sex toys that would be left out?
20	MR. PAGLIUSCA: Object to form and
21	foundation.
22	THE WITNESS: Yes, I did.
23	BY MR. EDWARDS:
24	Q. Can you describe the types of vibrators or
25	sex toys that you found left out after a massage



- 1 JOHN ALESSI
- 2 that Jeffrey Epstein had just received or Ghislaine
- 3 Maxwell had just received?
- 4 MR. PAGLIUSCA: Object to form and
- 5 foundation.
- 6 THE WITNESS: It was probably two to three
- 7 times, I would say. It was not all the time.
- 8 I would find things like a dildo, it's called a
- 9 double. I hate to say it because these ladies.
- 10 But I find these things, put my gloves on, took
- it out and rinse it, and put it in
- 12 Ms. Maxwell's closet.
- 13 BY MR. EDWARDS:
- Q. Why would you put the dildo or sex toy in
- 15 Ms. Maxwell's closet?
- 16 A. Because I knew that's where they were
- 17 kept.
- 18 Q. How did you know that the sex toys were
- 19 kept in Ms. Maxwell's closet?
- 20 A. Because I know where everything was in
- 21 that house. Every single room, every single thing,
- 22 it was a place, it was placed by me, by the cleaning
- 23 lady or my wife. Every -- everything that happened
- 24 in that house, I knew it.
- Q. Who showed you where the dildo or sex toys



Page 54 JOHN ALESSI 1 were kept in the house the first time? 2 3 MR. PAGLIUSCA: Object to form and foundation. 4 5 THE WITNESS: Nobody. Nobody show me. BY MR. EDWARDS: 6 7 You just saw it? Ο. I saw it. 8 So you knew where to put it back? 9 Ο. We had to open the closet, clean 10 Yeah. Α. the closet, put the clothes in place, put the shoes 11 in place, put everything in place. So it was a 12 matter of tidying things up. 13 Did you ever find any costumes? 14 Q. I saw one shiny black costume, but I 15 didn't even know --16 17 Where did you see it? 0. 18 Α. The same place. In Ms. Maxwell's closet? 19 Ο. 20 Α. Yes. And where was Ms. Maxwell's closet in the 21 Ο. 22 house? 23 Α. In the house? It was in the opposite side 24 of his bathroom. It was her bathroom in the master 25 bedroom. It was in the middle. So it was on the



- 1 JOHN ALESSI
- 2 BY MR. EDWARDS:
- 3 Q. That demonstrates that she was, I believe,
- 4 terminated from her employment in 2000.
- 5 My question to you is: Do you remember
- 6 what time of year or what month it would have been,
- 7 whether spring, summer, fall, winter; January,
- 8 February, December?
- 9 A. Of what year?
- 10 Q. Of 2000, that you would have gone to the
- 11 Mar-a-Lago?
- 12 A. It wasn't 2000.
- 13 MR. PAGLIUSCA: Object to form and
- 14 foundation.
- 15 BY MR. EDWARDS:
- 16 Q. Okay. Do you think it was a different
- 17 year that you went to Mar-a-Lago?
- 18 A. Yes.
- 19 Q. Okay. What year do you believe that you
- 20 went to the Mar-a-Lago to pick Virginia up?
- 21 A. I think it was 2000 and -- I think it was
- 22 the summer of 2002.
- 23 Q. Okay.
- 24 A. Summer, because I remember that day that I
- 25 was sweating like hell in the -- in the car, waiting



Page 95 JOHN ALESSI 1 for Ms. Maxwell to come out of the massage. 2 Q. 3 Okay. So what month of the summer do you remember it being? 4 5 I think in June, July, maybe, 2001. Α. 2000 and what? Ο. 7 2001. Α. June, July, 2001, that's when you believe 8 Ο. that it was? 9 10 Α. Yes. Okay. And do you remember the month --11 No, sorry. Sorry. Not 2001. We left in 12 December 31st. It was 2000 -- the last year that I 13 was working for Jeffrey, when I met Virginia. 14 O. Your recollection, as you sit here 15 today --16 17 Α. It was 2002. -- is that it was June or July of 2002 --18 Ο. 19 Α. 2002. -- when you met Virginia Roberts at the 20 Q. 21 Mar-a-Lago? 22 My recollection. Α. Okay. And other than the fact that you 23 were sweating, what else tells you what month that 24 it was that you remember meeting her at the 25



- 1 JOHN ALESSI
- 2 Mar-a-Lago?
- 3 A. It was -- I know it was summer of 2002,
- 4 and she spoke to -- far away. I wasn't -- I was in
- 5 the driveway, and she was far away talking to
- 6 Virginia. She spoke to her maybe five minutes.
- 7 Q. Okay.
- 8 A. And she came to the car, and we went home.
- 9 In the afternoon, about 4:00 or 5:00 in the
- 10 afternoon, the same day, Virginia came to the house.
- 11 Q. Who brought her to the house?
- 12 A. I don't know. She came to the back door,
- 13 I remember. And she was dressed differently. She
- 14 came to the house.
- 15 O. When you first arrived to the Mar-a-Lago
- 16 with -- are you driving the car and Ms. Maxwell is
- 17 in the passenger seat?
- 18 A. Yes.
- 19 Q. And could you see Virginia Roberts from
- 20 the car?
- 21 A. Yes.
- Q. Where was she sitting or standing? How
- 23 far away from the car?
- 24 A. She was standing right in front of the
- 25 driveway. This is the Mar-a-Lago, the house, and



- 1 JOHN ALESSI
- 2 here is the spa, and the driveway that's here. I
- 3 was parked this way, and I would see her with
- 4 Ms. Maxwell, talking.
- 5 Q. Did you --
- 6 A. I could not hear what they were saying,
- 7 but I did see it.
- 8 Q. Did you park the car or did you stop right
- 9 there and --
- 10 A. I parked the car because we are not
- 11 allowed to go into Mar-a-Lago.
- 12 Q. Okay. Let me finish my question.
- 13 Did you park the car in a parking space in
- 14 the parking lot or did you just stop on the side of
- 15 the road and Ms. Maxwell got out?
- 16 A. Mar-a-Lago has a -- has a long wide
- 17 driveway, and on the right of the driveway is -- is
- 18 the parking spots like this or something. And I
- 19 parked in one of those spaces. And waiting for her,
- 20 I think it was over an hour that I wait for her.
- Q. Okay. So did you watch her first talk
- 22 to --
- 23 A. No. At the end. Right at the end,
- 24 before -- when she was leaving.
- Q. So Ms. Maxwell gets out of the car. And



- 1 JOHN ALESSI
- when you're pulling up to the Mar-a-Lago, could you
- 3 see Virginia Roberts then?
- 4 A. No. No.
- 5 Q. So after you wait an hour, Ms. Maxwell is
- 6 coming out?
- 7 A. And then she saw Virginia and she
- 8 stopped -- she went to her, she talked to her, she
- 9 came back to the car.
- 10 Q. And prior to that day, you had never seen
- 11 Virginia at the house?
- 12 A. Never. Never.
- 0. Okay. Did Ms. Maxwell tell you that
- 14 Virginia's father worked at the Mar-a-Lago?
- 15 A. I don't think so. I think it was -- I
- 16 think we find out later, after the -- she says, My
- 17 father works -- I think it was from Virginia, that
- 18 she says her father works at Mar-a-Lago.
- 19 It is information from her. I don't think
- 20 it was Ms. Maxwell that told me anything. She don't
- 21 have to -- she don't have to talk to me. I mean,
- 22 Ms. Maxwell will not go and talk to me about this --
- 23 these people's family. I don't know. She never
- 24 did.
- Q. Okay. I only have to go by what I have.



	Page 103
1	JOHN ALESSI
2	I don't remember that day, how she got
3	home. I don't know. I can't remember.
4	Q. After that day, do you recall that she
5	started coming to the house more frequently?
6	A. Yes, she did.
7	Q. In fact, did she start coming to the house
8	approximately three times a week?
9	A. Yes, probably.
10	Q. And at times, would you go pick her up?
11	A. Yes. This happened maybe twice, three
12	times.
13	Q. And at times, would you take her home?
14	A. Yes.
15	Q. And did there come a point in time where
16	Virginia starting bringing other girls with her?
17	MR. PAGLIUSCA: Object to form and
18	foundation.
19	THE WITNESS: That was maybe two weeks
20	before we left. I saw her bringing some
21	friends with her to the house. And I cannot
22	remember how many times, but I was at the end
23	of our stay.
24	BY MR. EDWARDS:
25	O At the end of her [gig] gtay, you gaw when



- 1 JOHN ALESSI
- 2 she would come over to the house, she would bring
- 3 certain friends who were girls --
- 4 MR. PAGLIUSCA: Object to form and
- 5 foundation.
- 6 BY MR. EDWARDS:
- 7 Q. -- to the house, right?
- 8 A. Yes, females, yes.
- 9 Q. Do you know how long Virginia had been
- 10 coming over to the house before she started
- 11 traveling on an airplane with Ghislaine and Jeffrey?
- MR. PAGLIUSCA: Object to foundation.
- 13 THE WITNESS: Not too long. I don't think
- it was too long after that.
- 15 BY MR. EDWARDS:
- 16 Q. Would you drive her to the airport with
- 17 them?
- 18 A. Occasionally, I think so, yes. I would
- 19 drive everybody to the airport. My wife would drive
- 20 the chefs, the service people, the luggage to Jet
- 21 Aviation.
- Q. Is that where Mr. Epstein kept his plane,
- 23 Jet Aviation?
- 24 A. Yes.
- Q. At some point did Ghislaine Maxwell become



	Page 141
1	JOHN ALESSI
2	MR. PAGLIUSCA: Seven.
3	MR. EDWARDS: Seven?
4	(The referred-to document was marked by
5	the court reporter for Identification as
6	Deposition Exhibit 7.)
7	MR. EDWARDS: I apologize, Jeff. I just
8	can't find a copy right now.
9	MR. PAGLIUSCA: I have it.
10	MR. EDWARDS: Okay.
11	BY MR. EDWARDS:
12	Q. So this is a composite exhibit. It is
13	four pages. The first one that you're looking at
14	should be do you have SAO 01456?
15	MR. PAGLIUSCA: Yes.
16	MR. EDWARDS: Okay.
17	BY MR. EDWARDS:
18	Q. Does the format of this look familiar to
19	you?
20	A. Yes. It looks like the books that we used
21	to have that has the message books.
22	Q. How would that work? How would that
23	process work?
24	A. Somebody called, you write it down, and
25	you take the you leave the copy in the in the



Page 175 JOHN ALESSI 1 many things? 2 Α. Yes, she did. 3 Interesting buildings? 4 5 She -- she liked -- she had a dog, Α. No. and she took a lot of photographs of her dog. 7 And she took photographs of the cars and the Everything inside. She had an album full of 8 photographs of people, young girls, girls. And I 9 10 remember that she had. Like a hobby. 11 Q. Right. 12 You never saw any pictures that were very upsetting to you, though, correct? 13 No. No. 14 Α. Okay. And the pictures that you saw were 15 sort of -- would you describe them as being artistic 16 kind of pictures? 17 MR. EDWARDS: Objection, counsel 18 19 testifying. THE WITNESS: I think so. I don't think 20 they were pornographic. I don't think it was 21 22 any vaginal or things, you know, female parts showing. It was some girls were topless, 23 24 taking the sun. It was a beautiful house, it



was a beautiful setting, so she took a lot of

25

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Page 236
                            JOHN ALESSI
 1
 2
                      CERTIFICATE OF OATH
 3
     STATE OF FLORIDA
     COUNTY OF MIAMI-DADE
 4
 5
                 I, the undersigned authority, certify
        that JOHN ALESSI personally appeared before
 6
                                                        me
        and was duly sworn.
 7
                 WITNESS my hand and official seal
        this 1st day of June, 2016.
 8
 9
                     Kelli Ann Willis, RPR, CRR
                     Notary Public, State of Florida
10
                     Commission FF928291, Expires 2-16-20
                        + + + + + + + + + + + +
11
12
                           CERTIFICATE
13
     STATE
            OF
                 FLORIDA
     COUNTY OF MIAMI-DADE )
14
                 I, Kelli Ann Willis, Registered
15
        Professional Reporter and Certified Realtime
        Reporter do hereby certify that
16
        authorized to and did stenographically report the
        foregoing deposition of JOHN ALESSI; that a review
17
        of the transcript was not requested; and that the
18
        transcript is a true record of my stenographic
        notes.
                 I FURTHER CERTIFY that I am not a
19
        relative, employee, attorney, or counsel of
20
        of the parties, nor am I a relative or employee of
        any of the parties' attorney or counsel connected
        with the action, nor am I financially interested
21
        in the action.
22
                 Dated this 1st day of June, 2016.
23
24
                         KELLI ANN WILLIS, RPR, CRR
25
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Case 18-2868, Document 283, 08/09/2019, 2628241, Page27 of 883
EVHIDIT
EXHIBIT 2
(Filed Under Seal)
(Tired Circle Sear)

1	UNITED STATES DISTRICT COURT
2	for the SOUTHERN DISTRICT OF NEW YORK
3	Civil Action No. 15-cv-07433-RWS
4	VIRGINIA GIUFFRE,
5	Plaintiff,
6	VS.
7	GHISLAINE MAXWELL
8	Defendant.
9	
10	VIDEO-DEPOSITION OF: JAMES MICHAEL AUSTRICH
11	TAKEN BY: Defendant
12	REPORTED BY: Karla Layfield, RMR
13	Stenographic Court Reporter Notary Public
14	State of Florida at Large
15	DATE AND TIME: June 23, 2016; 9:03 a.m.
16	PLACE: Owen & Associates Court Reporters 108 N. Magnolia Avenue, Suite 501
17	Ocala, Florida
18	APPEARANCES: Laura A. Menninger, Esquire HADDON, MORGAN & FOREMAN, PC
19	150 East 10th Avenue Denver, Colorado 80203
20	Attorney for Defendant
21	Brad Edwards, Esquire Farmer, Jaffe, Weissing, Edwards,
22	FISTOS & LEHRMAN, PL 425 Andrews Avenue, Suite 2
23	Fort Lauderdale, Florida 33301 Attorney for Plaintiff
24	Also Present: Kenneth Sarsony, Videographer
25	Virginia Giuffre Owen & Associates Court Reporters
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Yes. 1 Α 2 Was it is a franchise, if you know? 3 I know when I first started there, they were 4 corporate, but then they were a franchise. They were 5 bought out. But I'm not sure if when I got there they were a franchise or not. 6 7 Got it. 0 8 Do you know if Ms. Roberts had any previous 9 employment before she worked at Taco Bell? 10 I think by the apartment, she worked for KFC for 11 a little while. 12 MS. MENNINGER: Are you looking at Ms. 13 Roberts? THE WITNESS: I'm thinking. 14 I can't 15 remember. I remember something with KFC. 16 had one really close to us. I think she worked 17 there for a tiny, tiny bit. I'm not sure. 18 MS. MENNINGER: Okay. 19 BY MS. MENNINGER: 20 Before the Taco Bell? 21 Or she could've applied there. It's just in my 22 head. She might have just applied there, and didn't get it, and that's why I brought her to Taco Bell. 23 24 Q Okay. 25 Because we were both the night managers. Owen & Associates Court Reporters P.O. Box 157, Ocala, Florida

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No. 1 Α 2 Do you know about what years this was? Q 3 Not really. Α 4 Do you know about how old you were? Q 5 When, what? Α 6 I'm just focused on the period of time in which 7 you were living at her parent's house in the trailer. 8 I was probably 18 when we moved in there. Α 9 Q And you said you were only there for a couple of 10 months? 11 Α Not that I remember. Like, it might have been a 12 little longer. I'm not sure. 13 0 Were you engaged to Ms. Roberts? 14 Α Yes. 15 Q When did you become engaged to her? 16 When we were living in Oakland Park. Α 17 Tell me about the engagement. How did it come Q 18 about? 19 Α Well, we fell in love, and -- I believe it was 20 Valentine's Day when I proposed. 21 Did you have a ring? Q 22 Yes. Α 23 Did she accept? Q 24 Α Yes. 25 Q How long were you engaged? Owen & Associates Court Reporters P.O. Box 157, Ocala, Florida 352.624.2258 * owenassocs@aol.com

Yes -- well, for a while. I mean, I know at the 1 2 end, I wasn't working anywhere. 3 Why weren't you working? Q 4 I don't remember the exact reason. 5 Had you quit? 6 I believe so. I know the pet store let me go 7 for walking on to the other side talking to somebody. But I don't remember why I left Dunkin' Donuts. 8 9 Q Do you believe that you were fired from Dunkin' 10 Donuts? 11 Α That pet store was the only time anybody No. 12 ever fired me. 13 That will stick in your brain. 14 Α Yeah. 15 Q At the time that you left the pet store, was Ms. Roberts still working there? 16 17 Α Yes. 18 And how long do you recall her working there? 19 Not long. 20 I hate to do this to you, but what does "not 21 long" mean to you, weeks, months, days? Over a month. That's really all I can say. 22 Α 23 Maybe over a month before she went to work at the 24 Mar-a-Lago or Donald Trump's country club. 25 Did she leave the pet store to go work at Owen & Associates Court Reporters P.O. Box 157, Ocala, Florida 352.624.2258 * owenassocs@aol.com

BY MS. MENNINGER: 2 Did you know her friend by the name of Tony 3 Figueroa? 4 Somewhat. Α 5 Tell me what you remember about Tony Figueroa. Other than him being an idiot, not much. 6 7 0 Did you have any interactions with Mr. Figueroa? 8 Very little. Α 9 When do you recall seeing him, like, in what 10 city, I mean? 11 Up in West Palm Beach. Α 12 Did he come over to your apartment? 13 I believe so. 14 Did you believe them to be having a 15 relationship? 16 At the very end when I left, yes. Α 17 Was that one of the reasons for your leaving? Q 18 One of them. Α 19 What were the others? 20 Well, after I found out about that, that's when 21 I heard about all the other stuff that was happening. 22 What did you hear about all the other stuff? Q Well, I mean, after she went to work for 23 24 Mar-a-Lago then she was, I guess, recruited to go work for 25 Jeff something. I don't remember his last name. Owen & Associates Court Reporters P.O. Box 157, Ocala, Florida 352.624.2258 * owenassocs@aol.com

Is that what she told you "she was recruited"? 1 2 Yeah. Well, she didn't use those words. But I Α 3 don't know why else anybody would take -- like, they hired 4 her over there as a massage therapist, but she didn't have 5 any experience. 6 At Mar-a-Lago 7 At Mar-a-Lago, yes. Then all of a sudden one 8 day, she was working for Jeff, whatever his name was. 9 Q Let me just take a step back. You found out 10 towards the end of your relationship with Ms. Roberts that 11 she was then having a relationship with Mr. Figueroa. 12 that right? 13 I don't know if it was a relationship. 14 yes. 15 Q Enough to cause you to think you didn't want to be engaged anymore? 16 17 Α Yes. 18 Did you and Ms. Roberts have a fight at that Q 19 time? 20 Yes. 21 What do you remember about the fight? What do Q 22 you recall? 23 I don't recall. I remember us having a fight Α 24 and then leaving not too long afterwards. 25 You referred to finding out all this other stuff Q Owen & Associates Court Reporters

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When you got the apartment in Oakland Park, you 1 2 got it with Virginia? 3 Well, yeah. She was living with us -- and 4 Mario. 5 MS. MENNINGER: All right. I think that's all I have. 6 7 MR. EDWARDS: Okay. 8 THE VIDEOGRAPHER: We're going off the record. This concludes disc one, volume one of 9 10 the video-deposition of James Michael Austrich. 11 We're going off the record. The time is 12 approximately 11:20 a.m. 13 (Break taken.) THE VIDEOGRAPHER: We're back on the record 14 15 with disc two, volume one, of the videodeposition of James Michael Austrich. And the 16 17 time is approximately 11:23 a.m. Thank you. 18 CROSS-EXAMINATION 19 BY MR. EDWARDS: 20 Mr. Austrich, as you know, my name is Brad 21 Edwards, and I represent Virginia. 22 Α Yes. 23 I'm going to ask you some follow-up questions to 24 the questions that you were asked previously. 25 All right? Owen & Associates Court Reporters P.O. Box 157, Ocala, Florida 352.624.2258 * owenassocs@aol.com

how long we lived there. 2 Okay. At some point in time, though, while Q 3 you're living on her parent's property, it becomes 1999? 4 Yeah, I believe. Α 5 Okay. And so when you started living at her parent's property, you're 18, she's 15, but at some point 6 7 in time you turn 19 and she turned 16? 8 Yes. Α 9 Q Okay. And at some other point in time, she 10 leaves the job at the pet store? 11 Α Pet store, yeah. 12 And goes to work at the Mar-a-Lago? 13 Yes. At Donald Trump's country club, yeah. 14 Okay. Donald Trump's country club is called the 15 Mar-a-Lago? 16 MS. MENNINGER: Objection. 17 THE WITNESS: Yeah, that's what I always 18 remember it as. Yes. BY MR. EDWARDS: 19 20 Is that right? 21 MS. MENNINGER: Objection, leading. I do get 22 a chance to object. Leading. 2.3 BY MR. EDWARDS: 24 When you used the term "Mar-a-Lago" and used the 25 term "Donald Trump's country club," are we talking about Owen & Associates Court Reporters P.O. Box 157, Ocala, Florida 352.624.2258 * owenassocs@aol.com

But if she had to get clean for her job, she 1 2 would have gotten clean for the job. 3 Okay. Do you remember her being hired as a Q 4 bathroom attendant there, a locker room attendant? 5 Now that you're saying that, some kind of attendant sounds familiar. But I don't really remember. 6 7 All I remember is for the massage. As a -- I don't 8 remember exactly what she got hired for at Donald Trump's 9 place. But I just remember the masseuse thing. 10 But as you're saying "the attendant," the attendant sounds familiar because I doubt her father would 11 12 hire her as a massage therapist without knowing anything. 13 So you had known her for some period of time 14 before she gets this job at the Mar-a-Lago, right? 15 Α Right. 16 Did she have any massage therapy training 17 whatsoever? 18 Α No. 19 Ever given a massage to anyone? 20 Not that I remember. 21 Ever given a massage to you? Q 22 Not until she was already doing the massage Α 23 stuff. But, no, I don't remember any kind of massage 24 training or even like an inkling for it. 25 Then when she goes to work for Okay. Q Owen & Associates Court Reporters P.O. Box 157, Ocala, Florida

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```
Mar-a-Lago, you don't remember, I think is the words you
 1
 2
     used, whether she worked there for weeks or months?
 3
          Α
               Yes.
               You don't remember?
 4
 5
               No, not at all.
 6
               And at the time when she gets the job at the
 7
     Mar-a-Lago, do you remember where you were working, if
 8
     anywhere?
 9
               No. I mean, I think at that time, I was working
     at one of the places. But I don't really remember where.
10
11
               And then, and I believe that you used this word,
12
     correct me if I'm wrong, she's recruited to work for Jeff?
13
               Yes.
14
               And do you remember her telling you that it was
15
     an assistant or somebody associated with Jeff that
     recruited her to work with Jeff?
16
               MS. MENNINGER: Objection, leading.
17
18
               THE WITNESS: I don't remember.
19
               MS. MENNINGER: Misstates the testimony.
20
               THE WITNESS: Sorry. I don't remember. All
21
          I remember was that somebody got her from there to
22
          Jeff.
               MR. EDWARDS: Got it.
23
24
     BY MR. EDWARDS:
25
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Then there's months; November, December. 1 Q So this is the year 2000, and these are the 2 3 months? MS. MENNINGER: Objection to this entire line 4 5 of questioning. The witness has no foundation for talking about this particular document. 6 7 BY MR. EDWARDS: 8 Okay. So do you know how long that -- as you Q 9 sit here today, do you remember how long Virginia had been 10 going over to Jeff's house before she started traveling on 11 an airplane with him? 12 MS. MENNINGER: Objection, foundation. 13 THE WITNESS: No. BY MR. EDWARDS: 14 15 Q It could be months, it could be a year? MS. MENNINGER: Objection, foundation. 16 THE WITNESS: I don't think it -- I don't 17 18 think she was there for very long without doing 19 traveling. 20 BY MR. EDWARDS: 21 But in your mind, you can't tell me how long 22 "very long" is? 23 No, I mean, I don't. Α 24 And is there anything that would tell you Okay. 25 the year or the month in which you remember Virginia first Owen & Associates Court Reporters P.O. Box 157, Ocala, Florida 352.624.2258 * owenassocs@aol.com

going over to Jeff's house? 1 2 Α Not really. 3 There's nothing I could really show you in this 4 world that would remind you right now? 5 No. Α 6 Before going over to work with Jeff, did Okay. 7 Virginia have any massage experience? 8 No. Α 9 When -- I think you said with respect to Q 10 "bringing other girls, that sounds familiar," what other 11 girls do you remember her bringing? Do you remember their 12 names? 13 I don't remember names. 14 MS. MENNINGER: Objection, foundation. 15 BY MR. EDWARDS: 16 Did you ever drive any of the other girls over Q to Jeff's house? 17 18 I don't think so. Α Okay. How many times did you to to Jeff's 19 20 house? 21 A few times. Like, I think I went -- I think I 22 dropped her off and somebody always brought her back. 23 don't really remember picking her up too much. 24 Okay. And in the beginning, she was telling you 25 that she was performing massages? Owen & Associates Court Reporters P.O. Box 157, Ocala, Florida 352.624.2258 * owenassocs@aol.com

```
Yeah, something like that.
 1
          Α
 2
               Do you know what time of year?
 3
               No.
          Α
 4
               Do you know whether the spa at Mar-a-Lago closes
 5
     during the summers?
 6
               MR. EDWARDS:
                              Form.
 7
                             No, I have no idea.
               THE WITNESS:
 8
     BY MS. MENNINGER:
 9
               You don't know how she got the job with Jeff?
10
               No. I know somebody -- somebody -- like,
     that's why I said "recruited" -- that's the only word I
11
12
     can think of -- that worked for Jeff.
13
               Why do you use the word "recruited"?
14
               Because that's the only word -- I don't know,
15
     football or everything. That's the only word I can think
     of, you recruit somebody.
16
17
               Hired her?
          Q
18
               Yeah, I guess. It was -- it was just a very
19
     fast thing.
20
               You don't know who that person was?
21
          Α
               No.
22
               You don't know what she said to that person?
          Q
23
          Α
               No.
24
               You don't know what that person said to her?
          Q
25
          Α
               Nope.
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```

```
Do you remember her coming home and saying "I
 1
 2
     got a job with Jeff"?
 3
               I remember she said she got a job with Jeff.
               Did she tell about that job?
 4
 5
               I think it was -- I think at the time it was for
 6
     massage therapy, like, she was going to be a masseuse.
 7
               And she was excited about it?
 8
               Yeah.
          Α
               She wasn't sad about it?
 9
10
               Not that I remember. But I really don't
          Α
     remember much from back then.
11
12
               She wasn't crying when she came home and said "I
13
     just got a job with Jeff," right?
14
          Α
               No.
15
               You're guessing that you -- she got the job with
     Jeff before you moved into the Bent Oak apartment, but you
16
17
     don't know. Correct?
18
               MR. EDWARDS:
                              Form
                              Yes. But I would think we
               THE WITNESS:
19
          would have had to have had the money by then.
20
          that was the only time she was making real good
21
          money.
22
     BY MS. MENNINGER:
2.3
24
               And do you know how much that apartment cost?
          Q
25
               I know it was expensive.
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```

1	CERTIFICATE
2	STATE OF FLORIDA
3	COUNTY OF MARION
4	I, Karla Layfield, RMR, Stenographic Court
5	Reporter, do hereby certify that I was authorized to and
6	did stenographically report the foregoing deposition of
7	James Michael Austrich; that said witness was duly sworn
8	to testify truthfully; and that the foregoing pages,
9	numbered 1 through 145, inclusive, constitute a true and
10	correct record of the testimony given by said witness to
11	the best of my ability.
12	I FURTHER CERTIFY that I am not a relative or
13	employee or attorney or counsel of any of the parties
14	hereto, nor a relative or employee of such attorney or
15	counsel, nor am I financially interested in the action.
16	WITNESS MY HAND this day of June, 2016, at
17	Ocala, Marion County, Florida.
18	
19	
20	Karla Layfield, RMR Stenographic Court Reporter
21	
22	
23	
24	
25	
	Owen & Associates Court Reporters

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Case 18-2868, Document 283, 08/09/2019, 2628241, Page43 of 883
EXHIBIT 3
LAIIDII 3
(Eilad Under Cool)
(Filed Under Seal)

Page 1

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

VIRGINIA L. GIUFFRE,

Plaintiff,

-against-

GHISLAINE MAXWELL,

Defendant.

250 N. Australian Avenue, Suite 1400 West Palm Beach, Florida 33401 Friday, September 9, 2016 8:35 a.m. - 2:08 p.m.

CONFIDENTIAL

VIDEOTAPED DEPOSITION OF JEFFREY EPSTEIN

Taken before Darline M. West,
Registered Professional Reporter, Notary Public
in and for the State of Florida At Large,
pursuant to Notice of Taking Deposition filed
by the Plaintiff in the above cause.

MAGNA LEGAL SERVICES 1200 Avenue of the Americas New York, New York 10026

(866) 624-6221



Page 74 J. Epstein - Confidential 1 BY MR. CASSELL: 2 3 Ο. Isn't it true that Maxwell led Virginia up 4 to your Palm Beach mansion massage room the first 5 time you met her? MR. PAGLIUCA: Object to form and 7 foundation. THE WITNESS: Fifth. 8 9 BY MR. CASSELL: 10 Q. You saw Maxwell bringing Virginia up to 11 your room, true, sir? 12 MR. PAGLIUCA: Object to form and foundation. 13 THE WITNESS: Fifth. 14 BY MR. CASSELL: 15 Isn't it true that it was standard 16 0. operating procedure for Maxwell to bring underage 17 18 girls up to your room? 19 MR. PAGLIUCA: Object to form and foundation. 20 THE WITNESS: Fifth. 21 22 BY MR. CASSELL: Isn't it true that it was standard 23 0. 24 operating procedure for Maxwell to bring underage 25 girls up to your room for you to sexually abuse?



Page 116 J. Epstein - Confidential 1 THE WITNESS: Fifth. 2 BY MR. CASSELL: 3 4 Q. In 2000, Virginia was approached by 5 Maxwell, true? 6 MR. PAGLIUCA: Object to form and 7 foundation. THE WITNESS: Fifth. 8 9 BY MR. CASSELL: 10 Q. Maxwell was one of the main women whom you used to procure underage girls for sexual activities, 11 12 true? MR. PAGLIUCA: Object to form and 13 foundation. 14 THE WITNESS: Fifth. 15 16 BY MR. CASSELL: 17 Q. It was your understanding that Maxwell met Virginia at the Mar-a-Lago Club in Palm Beach in 18 19 2000, true? MR. PAGLIUCA: Object to form and 20 21 foundation. 22 THE WITNESS: Fifth. 23 BY MR. CASSELL: 24 Q. In 2000, you were a member of the 25 Mar-a-Lago Club, true?



Page 117 J. Epstein - Confidential 1 MR. PAGLIUCA: Object to form. 2 THE WITNESS: Fifth. 3 BY MR. CASSELL: 4 5 Q. In 2000, Ms. Maxwell had access to the 6 Mar-a-Lago Club, true? 7 MR. PAGLIUCA: Object to form and foundation. 8 9 THE WITNESS: Fifth. 10 BY MR. CASSELL: 11 O. The reason Maxwell had access to the Mar-a-Lago Club in 2000 was because of your 12 connections to the club, true? 13 MR. PAGLIUCA: Object to form and 14 foundation. 15 THE WITNESS: Fifth. 16 17 BY MR. CASSELL: Q. Maxwell was a primary co-conspirator in 18 your sexual abuse scheme, true? 19 MR. PAGLIUCA: Object to form and 20 21 foundation. 22 THE WITNESS: Fifth. 23 BY MR. CASSELL: Q. Maxwell was a primary co-conspirator in 24 25 your sex trafficking scheme, true?

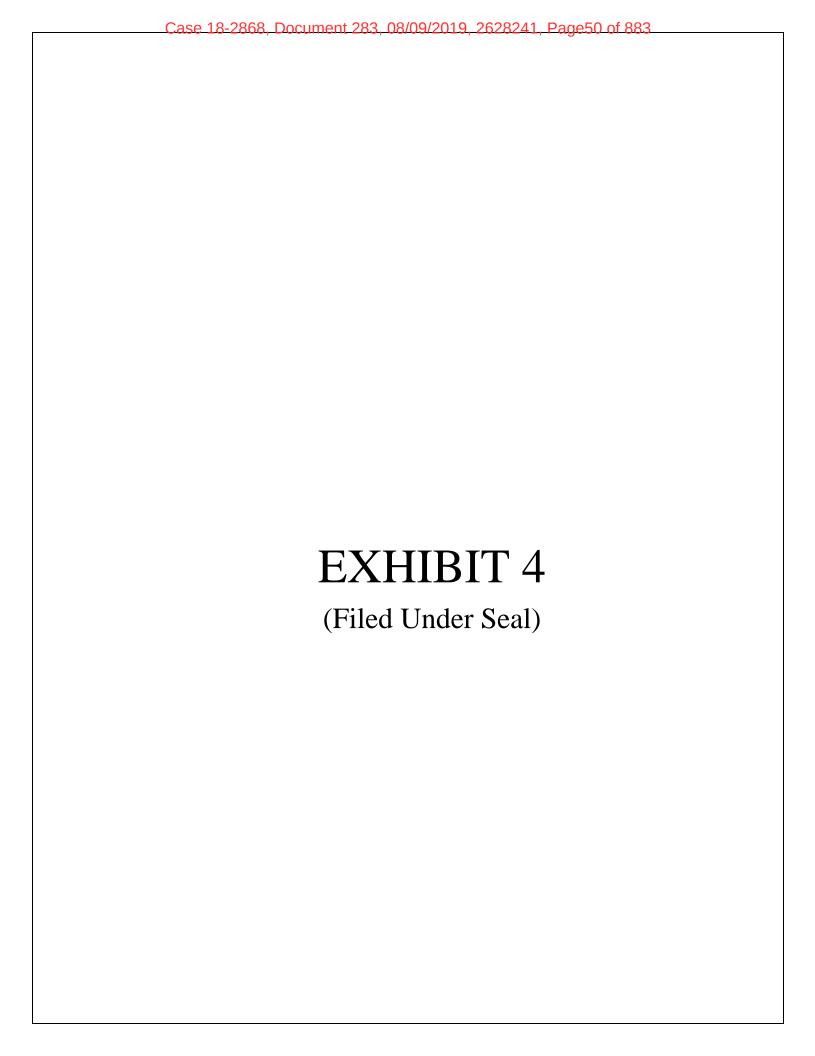


	Page 118
1	J. Epstein - Confidential
2	MR. PAGLIUCA: Object to form and
3	foundation.
4	THE WITNESS: Fifth.
5	BY MR. CASSELL:
6	Q. Maxwell herself regularly participated in
7	your sexual exploitation of minors, true?
8	MR. PAGLIUCA: Object to form and
9	found.
10	THE WITNESS: Fifth.
11	BY MR. CASSELL:
12	Q. In 2000, Maxwell herself regularly
13	participated in your sexual exploitation of minors,
14	true?
15	MR. PAGLIUCA: Object to form and
16	foundation.
17	THE WITNESS: Fifth.
18	BY MR. CASSELL:
19	Q. Maxwell herself regularly participated in
20	your sexual exploitation of Virginia, true?
21	MR. PAGLIUCA: Object to form and
22	foundation.
23	THE WITNESS: Fifth.
24	BY MR. CASSELL:
25	O Did Maxwell participate in your sexual



	Page 376
1	REPORTER'S CERTIFICATE
2	
	STATE OF FLORIDA
3	COUNTY OF PALM BEACH
4	
5	I, DARLINE MARIE WEST, RPR, certify that I was
6	authorized to and did stenographically report the
7	foregoing deposition; and that the transcript is a
8	true record thereof.
9	
10	I further certify that I am not a relative,
11	employee, attorney, or counsel of any of the parties,
12	nor am I a relative or employee of any of the
13	parties' attorney or counsel connected with the
14	action, nor am I financially interested in the
15	action.
16	
17	Dated this 13th day of September 2016.
18	
19	
20	
21	
22	DARLINE MARIE WEST, RPR
23	
24	
25	





UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CASE: 15-cv-07433-RWS

VIRGINIA GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

VIDEOTAPED DEPOSITION OF TONY FIGUEROA

Volume 1 of 2

Pages 1 - 157

Taken at the Instance of the Defendant

DATE: Friday, June 24, 2016

TIME: Commenced: 8:59 a.m.

Concluded: 1:22 p.m.

PLACE: Southern Reporting Company

B. Paul Katz Professional Center

(SunTrust Building)

One Florida Park Drive South

Suite 214

Palm Coast, Florida 32137

REPORTED BY: LEANNE W. FITZGERALD, FPR

Florida Professional Reporter Court Reporter and Notary Public

82 1 Q Right? 2 Yeah. Α And she travelled the world? 3 0 4 Α Uh-huh (affirmative). Yes. 5 Did JJ say there was anything weird about Q 6 her job? 7 Α No. MR. EDWARDS: Object to the form. 8 BY MS. MENNINGER: 9 10 Did you know whether she had any massage 0 11 training? 12 Α I did not. Like I said, the past three -three or four years before then, I had no contact 13 with her whatsoever. So I had no clue what she was 14 certified in or had done with her life. 15 16 Okav. I would like to take about a five-0 17 or ten-minute break, if that's okay with you. 18 Α That's fine. THE VIDEOGRAPHER: The time is 10:13. We 19 20 are off the record. The time is 10:27. We are back on the 21 2.2 record. 23 MS. MENNINGER: All right. I would like 24 to mark as an exhibit now Defendant's

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Exhibit 4.

25

- 1 certain times and stuff. And it would just -- you
- 2 know, it just did not make sense to me that it it
- 3 was just a masseuse, you know. Like I said, he's a
- 4 billionaire. You can afford another masseuse. Why
- 5 do you need her, you know.
- 6 Q Do you know whether he --
- 7 (Brief interruption.)
- 8 A Let me turn this down.
- 9 Q Sorry.
- 10 A I'm sorry.
- 11 (Briefly off the record.)
- 13 at the time?
- 14 A I -- I really don't know. All I know is
- he would have Virginia, obviously, go out and look
- for other girls, also, to bring back, as well.
- 17 Q And how do you know that?
- 18 A Because she had explained to me that
- 19 sometimes when she would go out on trips that her
- and Ms. Maxwell and stuff would go out to, like,
- 21 clubs and stuff and just try and pick up girls to
- 22 bring back, so...
- 23 Q That's what Virginia told you?
- 24 A Yes.
- 25 Q All right. Did any of your information --

- 1 (Brief interruption.) 2 I thought I muted it. Did any of your information come from 3 4 anywhere other than Virginia? 5 Α No. 6 MR. EDWARDS: Object to the form. 7 Like I said, I did not talk -- I did not Α 8 really speak to any of them other than, you know, hi, how's it going and stuff like that, until I had 9 10 actually met Jeffrey. And then he was the only one 11 I ever really spoke with. I had met Ms. Maxwell a 12 couple of times, but it was never, like, you know, 13 actual conversations, so... BY MS. MENNINGER: 14 15 All right. Well, let me -- when did you 16 meet Jeffrey?
- 17 A I'd probably say -- probably a few months
- 19 Q Okay. And how did you come to meet 20 Jeffrey?

after I had moved in with her.

- 21 A Dropping her off over at his mansion.
- 22 Q And did you drop her off using her car?
- 23 A Yes.

18

- Q And so she just asked you: Can you take
- 25 me over there?

- 1 A Yeah.
- 2 Q And did she tell you where to go?
- 3 A Yeah. She told where he lived and
- 4 everything. And then obviously I got to take the
- 5 car, because she was going somewhere else in the
- 6 world and did not need it, so...
- 7 Q You were dropping her off for a multi-day
- 8 trip?
- 9 A Yeah. She would normally go about two
- weeks out of every month, so...
- 11 Q Two weeks straight?
- 12 A Yeah. It was two weeks home and two weeks
- 13 gone, basically.
- 14 Q Did you always take her to his house,
- 15 or...
- 16 A Yeah. Pretty much every time I took her
- there, it was always to his mansion. I picked her
- up one time -- maybe it was a couple of times --
- 19 from the jet stream place. But pretty much every
- single time it was at the hou- -- at the mansion.
- 21 (Brief interruption.)
- Q Okay. So you're -- is that your phone?
- 23 I'm --
- 24 A No, it is. I thought I muted it.
- 25 O That's okay.

- 1 talking like that, so...
- Q Okay. Where did your first conversation
- 3 with Jeffrey take place?
- 4 A I'm pretty sure it was in the kitchen or
- 5 the living room.
- 6 0 Inside the house?
- 7 A Yeah, it was inside the house. I've never
- 8 seen him anywhere else other than in the mansion or
- 9 getting off the jet.
- 10 O So you were allowed to go inside the
- 11 house --
- 12 A Yeah.
- 0 -- with Ms. Roberts?
- 14 A Yeah. But I never went upstairs. I've
- only been in the kitchen, the living room, and by
- the pool.
- 17 Q How many times would you estimate that you
- 18 had been over to the house?
- 19 A I mean, at least once every two weeks to
- 20 drop her off, you know.
- 21 Q Was there a period of time between 2001
- and when she left in 2002 where she was not working
- for Jeffrey?
- 24 A Yes.
- Q What period of time was that?

1 Α It was pretty much, like, when she was 2 actually working as a server. Like, basically because we were trying to not have her go back 3 Like, she did not want to go back there. 5 And we were trying to just work without needing his 6 money, you know. 7 All right. And if I can re-call up that 8 Exhibit 2, can you see from here when about she was working as a server? 9 10 Α March 4th, '02. 11 Q Do you know about how long she worked 12 there? I do not. I'm not sure. 13 Α 14 Days? Weeks? Months? Anything? Q 15 I really have no clue. Α Okay. How old was Ms. Roberts in 2002, if 16 0 17 you know? 18 Α I'd probably say, like, 18 or so, maybe. If her birthday is in '83 --19 0 20 Oh, if it's in '83, then I'd say --Α 21 because I was born in '82, so a year younger than me 2.2 would be... 23 18, 19? Q 24 Α Yeah, somewhere around there.

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MR. EDWARDS: Object to the form.

25

1 I guess my question is: Did she ever tell 0 2 you that she had started as a regular masseuse for him and then transitioned to something other than a 3 4 masseuse? 5 She never said that it transitioned. Α No. 6 But she ended up explaining to me what had happened 7 before, so... What has -- what is that? 8 That her and Ms. Maxwell and Jeffrey would 9 10 obviously be doing stuff, all three of them 11 together. Like I said, that they would all go out 12 to clubs to pick up girls and try and find them to bring back for Jeffrey. And then she told me about 13 how, like I said, her and Ms. Maxwell and Jeffrey 14 were all intimate together on multiple occasions. 15 When did she tell you this? 16 0 17 I'm not exactly sure on the dates. Α 18 Was it while you were still together? 0 19 Α Yes. 20 0 Did you -- had you met Ms. Maxwell? 21 Yeah, I had met her a couple of times. Α 2.2 When did you meet Ms. Maxwell? 0 23 Α Dates, I'm unsure of. But it was pretty 24 much, like I said, at Jeffrey's house in the 25 kitchen.

- 1 0 Was it earlier in the time you were with 2 her, or... It was about -- I'd say about six months 3 I don't know. I'm not exactly positive. 4 or so. 5 All right. So at the time you met Q 6 Ms. Maxwell, had Ms. Roberts already told you that 7 she had been intimate? She had told me about that, I 8 No. believe, after I had max- -- after I had already met 9 10 her. 11 Okay. And tell me everything that you Q 12 remember about what Ms. Roberts said about being intimate with Ms. Maxwell and Mr. Epstein at the 13 same time. 14 I remember her talking about, like, 15 strap-ons and stuff like that. But, I mean, like I 16 17 said, all the details are not really that clear. 18 But I remember her talking about, like, how they 19 would always be using and stuff like that. 20 She and Ms. Maxwell and Mr Epstein would 0 21 used strap-ons? 2.2 Uh-huh (affirmative). 23 How did you feel about that? Q
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What did you say?

I just -- obviously not happy about it.

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Α

Q

- I did not. 1 Α 2 When the FBI interviewed you, did you mention this to them? 3 4 I mentioned -- anything they asked me, I 5 did not hold anything back. 6 Okay. Do you recall specifically talking 0 7 about sex with the Prince? I -- I don't recall talking to them about 8 that, but, I mean, it's -- it could be possible. 9 10 Other than sex with the Prince, is there 11 anyone else that Jeffrey wanted Ms. Roberts to have 12 sex with that she relayed to you? Mainly, like I said, just Ms. Maxwell and 13 Α all the other girls. 14 15 Ms. Maxwell wanted -- Jeffrey wanted Virginia to have sex with Ms. Maxwell? 16 17 And him, yeah. Α 18 And did she tell you whether she had ever 0 done that? 19
- 20 A Yeah. She said that she did.
- 21 Q And when did she tell you that?
- 22 A I'm not sure on the date.
- 23 Q And what did she describe having happened?
- 24 A I believe I already told you that. With
- 25 the strap-ons and dildos and everything.

1 CERTIFICATE OF REPORTER 2 STATE OF FLORIDA 3) COUNTY OF VOLUSIA) 4 5 6 7 I, Leanne W. Fitzgerald, Court Reporter, do hereby certify that I was authorized to and did stenographically report the deposition of TONY 8 FIGUEROA; and that the foregoing transcript is a 9 true record of my stenographic notes. 10 I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of 11 the parties' attorneys or counsel connected with the action, nor am I financially interested in the 12 action. 13 Dated this 5th day of July, 2016. 14 15 16 17 18 19 20 Leanne W. Fitzgerald, FPR Florida Professional Reporter 21 Digital Certificate Authenticated 22 By Symantec 23 24 25

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CASE: 15-cv-07433-RWS

VIRGINIA GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

VIDEOTAPED DEPOSITION OF TONY FIGUEROA

Volume 2 of 2

Pages 158 - 258

Taken at the Instance of the Defendant

DATE: Friday, June 24, 2016

TIME: Commenced: 8:59 a.m.

Concluded: 1:22 p.m.

PLACE: Southern Reporting Company

B. Paul Katz Professional Center

(SunTrust Building)

One Florida Park Drive South

Suite 214

Palm Coast, Florida 32137

REPORTED BY: LEANNE W. FITZGERALD, FPR

Florida Professional Reporter Court Reporter and Notary Public

168 1 Α Yes. 2 All right. And that belief was based on 0 Virginia telling you that? 3 4 And JJ and Michael. 5 Okay. So you had heard from some other Q 6 people, and then later --7 Yeah. Before she had come back to the Α apartment, they said that she was a masseuse for 8 9 this guy. And then when she came back, she told me. 10 All right. Once you started dating her 11 again -- I'm sorry. 12 Prior to dating her. Go back to the first time you were dating her. Did she have money? 13 14 Α No. 15 All right. Was she able to afford her own 0 16 place? 17 Α No. 18 Was she doing massages, at all? 0 19 Α No. 20 All right. Fast forward to the second 21 time when you get back together with her sometime in 2.2 2001. 23 Uh-huh (affirmative). Α 24 Did she appear to you to have any massage Q

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training?

1 Α No. 2 As a seventeen-year-old at that time, was she able to afford things? 3 4 MS. MENNINGER: Objection. Form. 5 Foundation. BY MR. EDWARDS: 6 7 Did she have money --Q She had money. 8 Α 9 -- while working with Jeff? 0 10 And was the money in the form of cash? 11 Α Yes. 12 0 And did she always have cash? Yes. 13 Α And how was the apartment paid for? 14 15 MS. MENNINGER: Objection. Form. Foundation. 16 17 Α Cash. 18 BY MR. EDWARDS: 19 And did you see how she was paying for the 20 apartment? 21 I did not watch her pay the bill, but... 2.2 Okay. When you would go to dinner, who 0 23 would pay? 24 Α Just whoever. 25 MS. MENNINGER: Objection. Form.

200 1 MS. MENNINGER: Objection. Form. 2 Foundation. For Jeffrey. 3 4 BY MR. EDWARDS: 5 All right. Let me fix this. Ghislaine --Q 6 when Ghislaine Maxwell would call you during the 7 time that you were living with Virginia, she would ask you what, specifically? 8 9 MS. MENNINGER: Objection. Form. 10 Foundation. 11 Α Just if I had found any other girls just 12 to bring to Jeffrey. BY MR. EDWARDS: 13 14 0 Okay. Pretty much every time there was a 15 conversation with any of them, it was either asking 16 17 Virginia where she was at, or asking her to get 18 girls, or asking me to get girls. 19 0 All right. Let's go to that second category you just identified, which is asking 20 21 Virginia to get girls. How many times were you in a 2.2 room where specifically Ghislaine Maxwell would ask 23 Virginia to bring girls? 24 Α None that I can recall.

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Okay. How many times -- when you say they

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0

- went with Virginia, and you dropped her off; and
- 2 some occasions you went inside?
- 3 A Yeah.
- 4 Q And some of the occasions you went inside,
- 5 you hung out by the pool?
- 6 A Yes.
- 7 Q Or in the kitchen with the chef?
- 8 A Yeah.
- 9 O All right. And in the total of all the
- 10 times that you went inside the house, you saw
- 11 Ms. Maxwell -- I think you got up to six times?
- 12 A Yeah, about five or six times.
- 13 Q All right. Total?
- 14 A Total.
- 15 Q That's not five or six times where --
- 16 A That was period, all together.
- 18 A No. All together, period.
- 19 O All right. I thought you said when I was
- asking you questions that Ms. Maxwell never asked
- 21 you to bring girls.
- 22 A I don't remember saying that.
- Q Okay. Well, tell me. When did
- Ms. Maxwell ask you to bring a girl?
- 25 A Never in person. It was, like, literally,

- like, on the phone maybe, like, once or twice.
- 2 Q All right. Did Ms. Maxwell call you
- 3 frequently?
- 4 A No.
- 5 Q All right. How many times do you think
- 6 Ms. Maxwell called you, at all?
- 7 A I'd just say that probably a just a few, a
- 8 couple of times. Maybe once or twice.
- 9 Q One or two --
- 10 A The majority of the time it was pretty
- 11 much his assistant.
- 12 Q How do you know Ms. Maxwell's voice?
- 13 A Because she sounds British.
- O So someone with a British accent called
- 15 you once or twice and asked for --
- 16 A Well, she told me who she was.
- 17 Q Okay. And what did she say when she
- called you and asked you to bring girls?
- 19 A She just said, "Hi. This is Ghislaine.
- Jeffrey was wondering if you had anybody that could
- 21 come over."
- 22 O Okay. When did that happen?
- 23 A I'm not exactly sure on the time frame.
- Q Was it after the Roadhouse Grill or
- 25 before?

So the thing that Virginia was tired of --1 0 2 just so that the record is clear -- well, I'll let you answer in your words. Just be clear. 3 4 What was it that Virginia was trying to 5 get away from and stop with respect to working at 6 Jeffrey Epstein's house? 7 MS. MENNINGER: Objection. Form, 8 foundation -- as to Virginia's thought 9 processes. 10 To stop being used and abused. 11 BY MS. MENNINGER: 12 0 How do you know that? 13 MS. MENNINGER: Objection. Form. Foundation. 14 Due to all the things that I have come 15 16 to -- that have been brought to light, and in the 17 experiences that I've had, and the conversations 18 that I have had with her. Like, it just all adds up to that, so... 19 20 BY MS. MENNINGER: 21 When Virginia was wanting to get out, did 2.2 she ever express that it was the times of work that 23 she was trying to get away from? 24 Α No. 25 Okay. What was she specifically 0

1	Q Was she getting paid as much as she was
2	getting paid to work for Jeff Epstein?
3	A Definitely not.
4	Q She no longer had cash all around?
5	A Nope.
6	Q You mentioned that there was you had
7	several conversations with Virginia when she was
8	discussing them wanting or I think the word you
9	used was force, but later we tried to clarify that,
10	but them forcing her to have sex with Prince Andrew.
11	Do you remember that?
12	A Yeah.
13	Q And that you expressed that you were
14	worried for her safety if she were to decline that?
15	A Yes.
16	Q What about your conversation with Virginia
17	on that particular occasion made you worried for
18	Virginia's safety?
19	A Just the way she was talking to me. Like,
20	she just sounded scared.
21	Q And what what try to dig back and
22	remember what exactly she was saying and how she was
23	saying it, if you could just describe that for us.
24	A She said that she went to go in I
25	remember at one time she was talking to me about how

258 1 CERTIFICATE OF REPORTER 2 STATE OF FLORIDA 3) COUNTY OF VOLUSIA) 4 5 6 7 I, Leanne W. Fitzgerald, Court Reporter, do hereby certify that I was authorized to and did 8 stenographically report the deposition of TONY FIGUEROA; and that the foregoing transcript is a 9 true record of my stenographic notes. 10 I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of 11 the parties' attorneys or counsel connected with the action, nor am I financially interested in the 12 action. 13 Dated this 5th day of July, 2016. 14 15 16 17 18 19 20 Leanne W. Fitzgerald, FPR Florida Professional Reporter 21 Digital Certificate Authenticated 22 By Symantec 23 24

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EXHIBIT 5 (Filed Under Seal)

GIUFFRE

VS.

MAXWELL

Deposition

VIRGINIA GIUFFRE

05/03/2016

Agren Blando Court Reporting & Video, Inc.

216 16th Street, Suite 600 Denver Colorado, 80202 303-296-0017

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

CONFIDENTIAL VIDEOTAPED DEPOSITION OF VIRGINIA GIUFFRE May 3, 2016

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

APPEARANCES:

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9	Nicholas r. Bolgia, Chvs Videographei
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1	you don't.
2	Do you have any reason to believe that any
3	of your previous sworn statements that you have made
4	are not true?
5	A No.
6	MR. EDWARDS: I just object and ask that
7	if we're going to ask the witness questions about any
8	of her statements in whole or in part that the
9	witness be allowed to see the statement, review the
10	statement and then answer your questions.
11	Q (BY MS. MENNINGER) You may answer the
12	question.
13	A Can you reask the question? I'm sorry.
14	Q Do you have any reason to believe that any
15	of your prior sworn statements are untrue?
16	A I have no reason to believe that my prior
17	statements are untrue.
18	Q Has anyone told you to say something that
19	was not true in connection with this case?
20	A No, ma'am.
21	Q All right. I'd like to start with a
22	lawsuit that you filed under the caption Jane Doe
23	versus Jeffrey Epstein.
24	Do you recall that lawsuit?
25	A I believe so.

1	(Exhibit 1 marked.)
2	Q (BY MS. MENNINGER) I'm going to show you
3	an exhibit that we are marking as Defendant's
4	Exhibit 1.
5	MR. EDWARDS: Can I see that for a second?
6	I'd just like to make an objection on the
7	record for the misidentification of this document.
8	While there was a lawsuit filed under the
9	style of Jane Doe versus Jeffrey Epstein, Jane Doe
10	was not Virginia Giuffre. And the lawsuit that's now
11	being handed to this witness is Jane Doe 102 versus
12	Jeffrey Epstein.
13	Is that the document we're talking about?
14	MS. MENNINGER: Counsel, if you have an
15	objection, you should state the basis for your
16	objection in a non-leading, non-suggestive manner.
17	If you have any other record to make, you
18	can do so in a pleading filed with the Court.
19	MR. EDWARDS: Sure. My objection is
20	you've misrepresented what you've handed the witness.
21	I want to make sure that the witness is holding what
22	you actually want her to be holding as opposed to the
23	lawsuit you said that you were going to hand her.
24	That's it.
25	MS. MENNINGER: Counsel, I will ask the

VIRGINIA GIUFFRE 5/3/2016

1 January 19th, 2015? 2 At the very top of the page it says 3 January 21st, 2015. 4 The date it was filed. Is there a date Q 5 just above the signature block? 6 Α Oh, yes, sorry. Yes, there is. 7 And what date -- what date was that? Q 8 Α The 19th day of January, 2015. 9 Okay. And this document is something that 0 10 you believe contains the truth, correct? 11 To the best of my knowledge at the time, Α 12 yes. 13 All right. Did something change between O 14 the time then and today that makes you believe that 15 it's not all accurate? 16 Α Well, as you can see, in line 4 on page 1, 17 I wasn't aware of my dates. I was just doing the 18 best to quesstimate when I actually met them. 19 Since then I've been able to find out that 20 through my Mar-a-Lago records that it was actually 21 the summer of 2000, not the summer of 1999. 22 Q Oh, I'm sorry. Are you back on page 1? 23 Α On the first page. 24 Q Okay. 25 Α Yes.

1 MR. EDWARDS: Objection. Asked and 2 answered. 3 0 (BY MS. MENNINGER) You may answer. MR. EDWARDS: Answer again. 4 5 Again, I wouldn't say it's untrue. Untrue Α would mean that I would have lied. And I didn't lie. 6 7 This was my best knowledge at the time. And I did my 8 very best to try to pinpoint time periods going back 9 such a long time ago. 10 It wasn't until I found the facts that I 11 worked at Mar-a-Lago in 2000 that I was able to 12 figure that out. 13 (BY MS. MENNINGER) And approximately when 14 did you learn those facts about the dates you worked 15 at Mar-a-Lago? 16 Α I would say it was mid-2015. 17 Mid-2015 is the first time you became O 18 aware of the dates --19 Α I don't know the exact --20 If you could just let me finish. 0 21 Α I'm sorry. 22 That's all right. Approximately mid-2015 0 23 when you learned the true dates that you had worked 24 at Mar-a-Lago? 25 Α That's correct. Sorry.

1 MR. EDWARDS: Object to the form. 2 Α Uhm, I don't know, to be honest. 3 0 (BY MS. MENNINGER) And in what order did 4 Taco Bell, Publix and Mar-a-Lago go, and the aviary, 5 sorry? 6 Α Oh, I would have to guess. Do you want me 7 to quess? 8 0 Sure. 9 Um, I would say Publix. And then, I think Α 10 that's when I helped my boyfriend out at Taco Bell 11 and then I think the aviary. 12 And where was the Taco Bell? 0 13 I was living in Fort Lauder -- I think it 14 was Fort Lauderdale. Don't quote me on that, but 15 somewhere in Florida, Broward County, something like 16 that. 17 And who were you living with at that time? O 18 Α Michael. His name is James, but Michael. 19 So you were living with Michael when you Q 20 worked at the Taco Bell, right? 21 Yes, I was living with him. Α 22 And you worked with Michael when you Q 23 worked at the Publix, correct? 24 Α No. 25 Okay. So Publix came after Taco Bell or Q

1 Whatever address you were living at, at Q 2 the time you started at Mar-a-Lago. 3 Α Loxahatchee, Florida 4 33470. 5 How is it that you came to work at Q 6 Mar-a-Lago? 7 Α My dad is a maintenance manager or 8 supervisor, I don't know what you call it. But he 9 worked in the maintenance department, mostly on 10 tennis courts, working on the air conditioning, 11 helping set up for functions. And he got me a summer 12 job there. 13 Okay. And you said you were on a break? O 14 Α Yes. 15 What were you on a break from? Q 16 Α I think like -- this is going back so long 17 now, but I was attempting to get my GED. And it, 18 summer came, so school stops during the summertime 19 here in America, and I got a summer job. 20 All right. And where were you in school? 0 21 Α I don't actually know the name of the 22 It's -- yeah, I know. place. 23 Q A GED place? 24 Yeah, it was, like, I was previously in 25 Royal Palm Beach High School, but, I mean, because of

1 Okay. If I can direct your attention back Q 2 to Defendant's Exhibit 12 at page 15. And under the 3 heading Response to Interrogatory Number 9, do you 4 see that where it says --5 Α Yes. -- Ms. Joffrey (pronouncing) -- Giuffre, 6 O 7 excuse me, responds as follows? 8 Α Yes. 9 It says you worked as a locker room Q Okay. 10 attendant for the spa area, correct? 11 Α Yes. 12 And it says records produced in this case 0 13 identify the date of employment as 2000, correct? 14 Α Yes. 15 What records that were produced in this Q 16 case cause you to believe that the employment began 17 in 2000? 18 Α Uhm, is this going back to another 19 question that I'm not allowed to answer? 20 0 No. I have seen the documents, and I know that 21 Α 22 my employment now was in 2000. 23 What documents did you see that caused you Q 24 to make that answer?

The Mar-a-Lago employment documents.

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Α

masseuses had their own uniforms. 1 2 What did the masseuses' uniform look like? 0 3 Α I don't remember. No recollection at all? Q 5 None whatsoever. Α Color? 6 Q 7 Α No, sorry. I remember mine. 8 Okay. How did it come to pass that you 0 9 were no longer working at Mar-a-Lago in two to three 10 weeks? 11 Α I was approached by Ghislaine Maxwell. 12 And how long had you been working 0 Okav. 13 at Mar-a-Lago when you were approached by Ghislaine 14 Maxwell? 15 Α Roughly two to three weeks. 16 0 Okay. Where in the spa were you when you 17 were approached by Ghislaine Maxwell? 18 Α Just outside the locker room, sitting 19 where the other girl that works there usually sits. 20 She was away from the desk. I was reading a book on 21 massage therapy. 22 Was that indoors or outdoors? 0 23 Outdoors. Α 24 Okay. And what -- were you in the sun or 0 in the shade? 25

1 wanted to aim for something higher than being a 2 locker room attendant one day. And. 3 What was the name of the massage therapist Q that you were speaking with? 4 5 Oh, I have no idea. Α Can you give me any physical description 6 O 7 of any of them? 8 Um, there was one who had blonde short Α 9 There was -- I would say there's probably 10 about four massage therapists that work in there. 11 So, I mean, I don't remember all of them. 12 Q Okay. What time of day was it? 13 MR. EDWARDS: Object to the form. 14 Α Afternoon. 15 (BY MS. MENNINGER) How late? Q 16 Α Anywhere between 2 to 4. 17 And what time did you get off of work? Q 18 Α I believe I got off at 5. 19 And what was the rest of your conversation Q 20 with Ms. Maxwell? 21 I'm sorry, I don't think you finished. 22 Thank you. Well, she noticed I was Α 23 reading the massage book. And I started to have

chitchat with her just about, you know, the body and

the anatomy and how I was interested in it. And she

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- told me that she knew somebody who was looking for a traveling masseuse.
- And I said, Well, I don't have any
- 4 accreditations. This is the first book I've ever
- 5 read. She goes, That's okay. I know somebody. We
- 6 can train you. We can get you educated. You know,
- we can help you along the way if you pass the
- 8 interview.
- If the guy likes you, then, you know, it
- will work out for you. You'll travel. You'll make
- good money. You'll be educated, and you'll finally
- 12 get accredited one day.
- Q Okay.
- 14 A She finished off by, you know, giving me
- her number. And I told her I'd have to ask my dad.
- And I called my dad. I ran over, actually, to see my
- dad, talked to him. He said it would be okay. I
- used the phone from Mar-a-Lago to call her and tell
- her that I was allowed to come over.
- 20 And she said, Great. Meet me here at -- I
- don't remember the exact address, but it was
- 22 El Brillo Way in Palm Beach -- after you get off.
- 23 And my dad drove me.
- Q Did you write down her add -- the address
- 25 that she gave?

1 Α Yes. 2 Did you write down her phone number? O 3 Α Yes. 4 So did you go run and talk to your dad Q while she was still there? 5 6 No, I believe she left. And she told me Α 7 to ask my dad and then to give her a phone call. 8 Okay. Did she ask you your age when she 0 had that conversation with you? 9 10 Α No, she did not. 11 Did you tell her your age? 0 12 No, I did not. Α 13 And so somewhere you wrote down a phone 0 14 number to call her back at? 15 Α Um-hum. 16 Q All right. And where did you write that 17 down? 18 Α Probably just a piece of paper lying around the desk. 19 20 Okay. But you don't remember? 0 I mean, no, I don't have that piece of 21 Α 22 paper anymore, so no. 23 Okay. And did you write down an address? Q 24 Α Yes. 25 And what number do you think you called? Q

1 Q When did you get your first car? 2 Α After my trip to London to meet Prince 3 Andrew. 4 Okay. What kind of car did you get? Q 5 Α A Dodge Dakota. 6 Q And did you purchase that yourself? 7 Α Yes, I did. 8 And how much did it cost? 0 9 Α I don't remember off the top of my head 10 how much it cost. 11 Who did you buy it from? 0 12 Α My dad helped me bargain with it. I don't 13 remember where we bought it from. 14 And was the title put in your name or your dad's name? 15 16 Α I think the title was put in my name. Ι 17 I mean, my dad was with me. I've never 18 registered a car or anything like that before. So --19 So that was your first time? Q 20 Α Yes. 21 Memorable, right? Q 22 Α Yes. 23 Q When you got there, a butler or someone 24 answered the door, is that what you said? 25 No, Ghislaine answered the door. Α

1 Α Yes. 2 O Who else was at home when you got home? 3 Α My mom, my dad and my brother. Which brother? Q 5 Α Sky. 6 O And anyone else who was there at the time? 7 Α I believe Michael might have been living 8 with me at that time. So he might have been there. 9 O Do you recall if he was there when you got 10 home? 11 Α I don't really remember. I remember what 12 I did when I got home, that I basically made a 13 beeline for the bathroom. 14 Let me ask you a question. Michael was Q 15 living with you at that home, at your parents' home 16 at the time, is your best recollection today; is that 17 right? 18 Α That's my best recollection, yes. 19 When you say living with you, were you Q 20 quys staying in the same room? 21 Yes. Α 22 Were you engaged at that time to him? 0 23 That was a really weird relationship. Α 24 was a friend who looked after me, and he did propose to me and I did say yes. But my heart was never in 25

1	it.
2	He was somebody that helped me off the
3	streets so I felt compelled to say yes to him.
4	Q Okay. So when he proposed to you and you
5	said yes, did that take place before you started
6	working at Mar-a-Lago or after you started working at
7	Mar-a-Lago?
8	A Before.
9	Q And so if he were living with your parents
10	at that time, you were living in the same room; is
11	that correct?
12	A I believe so.
13	Q And your parents understood him to be your
14	fiance?
15	A I don't think they agreed with it, but I
16	think they understood it as that. I mean
17	Q I mean, you communicated to them that he
18	had proposed and you had accepted?
19	A Yeah, in not such a pretty way. I mean,
20	they obviously weren't very happy about it. And it
21	wasn't my true intentions to ever marry him.
22	Q Okay.
23	A But I did it to make him feel okay. I
24	didn't want to be mean.
25	Q What did your mom say about your

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1 I believe Juan Alessi was pretty much within ear distance. 2 3 Q Could you see him? Α Yes. 5 O Okay. Like I said, in ear distance, when I mean 6 Α 7 ear distance like hearing, in the hearing vicinity. 8 And it was in the same time that she was asking him 9 to drop me off at home. 10 Okay. When you were driving home the 11 first night with Juan Alessi, did you have any conversation with him? 12 13 No. I had told him my address. It was a 14 very quiet ride. 15 Q Did you ride in the front or the back? 16 Α The front. 17 It is your contention that, Ghislaine O 18 Maxwell had sex with underage girls virtually every 19 day when I was around her, correct? 20 Α Yes. 21 All right. With whom did Ghislaine Q 22 Maxwell have sex in your presence? 23 Α Well, there's a lot of girls that were 24 We weren't on a first name basis with each other. I wouldn't be able to give you lists of names 25

1 of girls. It was continuous. 2 It was continuous. Name one girl that 3 Ghislaine Maxwell had sex with in your presence. Emmy Taylor. I mean, that's a name that I Α 5 know well because Emmy was always around. I'm trying to think of her name, sorry. 6 7 Her name used to be Sarah Kellen. I think Sarah. 8 she's changed it now that she's married. (phonetic) -- I can't 9 10 pronounce her last name properly, but it's around 11 those lines. 12 There were a lot of other girls that I 13 honestly can't remember their names. I'm sorry. I 14 wish I could help out more because I really would 15 like to provide more witnesses for this, but I can't 16 remember a lot of girls' names. 17 So those are the three names of females 18 that you observed Ghislaine Maxwell have sex with --19 MR. EDWARDS: Object to the form. 20 Mischaracterizes testimony. 21 (BY MS. MENNINGER) -- is that what I Q 22 understand your answer to be? 23 MR. EDWARDS: Objection. Mischaracterizes 24 her testimony. 25 Those are -- those are some three of the Α

1 Q More than 20? 2 Α I would say more than 20. 3 0 More than 50? 4 Α I don't think more than 50, but --5 Did --O 6 Α I don't have an exact number. I mean, 7 if -- I think if you look at the flight logs, you 8 know, that helps, but then they're not fully 9 complete. We only have flight logs to one plane and 10 then there's a time I was flown commercially into the 11 island. 12 0 Um-hum. 13 Α So it's really hard for me to gauge a 14 number. 15 Q Okay. Do you have any photographs of 16 yourself on the island? I know I used to, but they would be left 17 Α 18 in that apartment. 19 What other locations did you participate Q 20 in sexual contact with Ghislaine Maxwell, other than 21 the island? 22 Α Everywhere. New York, Palm Beach. 23 Where in New York? Q 24 The mansion, Jeffrey's mansion. Α 25 Okay. Anywhere else in New York? Q

1 think I met Prince Andrew in 2001. And Glenn Dubin 2 and Stephen Kaufmann were, like I said, the first 3 people I was sent out to after my training. So I 4 don't know. I'm not going to give you an exact time 5 if I don't know it. I asked you the relative order. 6 O 7 Α And I'm trying to give you it. 8 And where does Alan Dershowitz fit into 0 9 that group of people? 10 I can't tell you piece by piece by Α Same. 11 piece who -- I know Glenn Dubin was first. 12 Q Okay. 13 And I know Stephen Kaufmann was one of the 14 first I was sent to. Alan Dershowitz could have been 15 between there. Between, sorry, between Glenn and 16 Stephen. The first time I was with Alan Dershowitz 17 was in New York, so I wasn't actually sent to him. 18 It actually happened at one of Jeffrey's residences. 19 (Ms. McCawley left the deposition.) 20 Α So it's very hard for me to 21 chronologically give you each person individually. 22 (BY MS. MENNINGER) Okay. Name the other 0 23 politically connected and financially powerful people 24 that Ghislaine Maxwell told you to go have sex with? 25 Again, I'm going to tell you "they" Α

1 because that's how it went. They instructed me to go 2 to George Mitchell, Jean Luc Brunel, Bill Richardson, 3 another prince that I don't know his name. A quy 4 that owns a hotel, a really large hotel chain, I 5 can't remember which hotel it was. Marvin Minsky. 6 There was, you know, another foreign 7 president, I can't remember his name. He was 8 Spanish. There's a whole bunch of them that I 9 just -- it's hard for me to remember all of them. 10 You know, I was told to do something by these people 11 constantly, told to -- my whole life revolved around 12 just pleasing these men and keeping Ghislaine and 13 Jeffrey happy. Their whole entire lives revolved 14 around sex. 15 They call massages sex. They call 16 modeling sex. They call --17 I asked you the names for people. Are you 18 going to tell me any other names or is that all of 19 them? 20 I'm trying to think. That's the answer 21 I'm trying to give to you. It's that it's so hard to 22 just keep naming and naming and naming. 23 All right. Q 24 A lot of times I would be introduced to them. I didn't know --25

1	many times you want me to keep answering this
2	question. Both told me to do this, okay? They both
3	sent me to these people.
4	How many times do you want me to answer
5	this?
6	Q (BY MS. MENNINGER) I think you're
7	answering a different question so that's why I'm
8	going to ask you again. I am not asking you anything
9	about a time when Jeffrey and Ghislaine together told
10	you to go do something. I'm asking you to name a
11	single time during which Ghislaine Maxwell acting
12	alone directed you to go have sex with another
13	person?
14	MR. EDWARDS: Objection. Asked and
15	answered. Harassing. Argumentative.
16	A I've given you the names of the people
17	that Ghislaine instructed me to go have sexual
18	relations with. I am not discluding (sic) the fact
19	that Jeffrey also told me.
20	Ghislaine told me from her mouth to do
21	these things. Jeffrey told me from his mouth to do
22	these things with these people. Ghislaine instructed
23	me to do the things that I did with Jeffrey Epstein
24	on the very first meeting that I had with him. She
25	brought me there under the preclusion (sic) that I

- was going to be trained as a masseuse and that she instructed me to take off my clothes and to give oral
- 3 sex to Jeffrey Epstein.
- 4 Q (BY MS. MENNINGER) Excuse me. I've asked
- 5 you for the names.
- A I've just given you a name. Jeffrey
- 7 Epstein is a big name.
- 8 Q All right.
- 9 A She instructed me on that one.
- 10 Q So you're saying --
- MR. EDWARDS: The witness is finishing her
- answer right now. She's in the process of explaining
- one of the people Ghislaine told her to have sex
- with.
- Q (BY MS. MENNINGER) So you're saying
- Ghislaine Maxwell directed you to have sex with
- Jeffrey Epstein?
- 18 A Correct.
- 19 Q Ghislaine Maxwell directed you to have sex
- with Glenn Dubin?
- 21 A Correct.
- Q What words did Ghislaine Maxwell tell you
- to go have sex with Glenn Dubin?
- A It was the same all the time, all right?
- They want me to go provide these men with a massage.

1 Α When it happened? 2 When Ghislaine Maxwell used the words, Go 3 give a massage to Bill Richardson, where were you? 4 MR. EDWARDS: Object to the form. 5 Mischaracterizes her testimony. 6 I can't tell you where we were. I know 7 where I was sent to. I don't know where we were when 8 she told me to do that. 9 (BY MS. MENNINGER) Where were you sent 0 10 to --11 New Mexico. Α 12 -- by Ghislaine Maxwell? 0 13 MR. EDWARDS: Object to the form. 14 Mischaracterizes her testimony again. 15 Α Are you smiling at me because --16 0 (BY MS. MENNINGER) No, I'm asking you to 17 answer the question. 18 Α I have answered the question. I was sent 19 to New Mexico. 20 Okay. Where were you sent from? 0 21 I already answered that. I don't know Α 22 where I was sent from. 23 Q Okay. 24 I was flying everywhere with these people. Α 25 Where were you sent by Ghislaine Maxwell Q

1 No, she was not in the room. She was in another cabana. 2 3 And other than telling you to go give the 0 4 owner of this large hotel chain a massage, do you 5 remember any other words she used to you to direct you in what you should do? 6 7 Α Not at the time, no. 8 Where did -- where were you and where was 0 9 Ms. Maxwell when she directed you to go have sex with 10 Marvin Minsky? 11 MR. EDWARDS: Object to the form. 12 Α I don't know. 13 (BY MS. MENNINGER) Where did you go to 0 have sex with Marvin Minsky? 14 15 Α I believe it was the U.S. Virgin Islands, 16 Jeff's -- sorry, Jeffrey Epstein's island in the U.S. 17 Virgin Islands. 18 O And when was that? 19 Α I don't know. 20 Do you have any time of year? 0 21 Α No. 22 Do you know how old you were? 0 23 Α No. 24 Other than Glenn Dubin, Stephen Kaufmann, 0 Prince Andrew, Jean Luc Brunel, Bill Richardson, 25

1 another prince, the large hotel chain owner and 2 Marvin Minsky, is there anyone else that Ghislaine 3 Maxwell directed you to go have sex with? 4 I am definitely sure there is. But can I Α 5 remember everybody's name? No. 6 Okay. Can you remember anything else about them? 7 8 Α Look, I've given you what I know right 9 now. I'm sorry. This is very hard for me and very 10 frustrating to have to go over this. I don't -- I 11 don't recall all of the people. There was a large 12 amount of people that I was sent to. 13 Do you have any notes of all these people 14 that you were sent to? 15 Α No, I don't. 16 Q Where are your notes? 17 I burned them. Α 18 O When did you burn them? 19 In a bonfire when I lived at Titusville Α because I was sick of going through this shit. 20 21 Did you have lawyers who were representing 22 you at the time you built a bonfire and burned these 23 notes? 24 I've been represented for a long time, but it was not under the instruction of my lawyers to do 25

- this. My husband and I were pretty spiritual people
- and we believed that these memories were worth
- 3 burning.
- 4 Q So you burned notes of the men with whom
- you had sex while you were represented by counsel in
- 6 litigation, correct?
- 7 MR. EDWARDS: Object to the form.
- 8 A This wasn't anything that was a public
- 9 document. This was my own private journal, and I
- didn't want it anymore. So we burned it.
- 11 Q (BY MS. MENNINGER) When did you write
- that journal?
- 13 A Just over time. I started writing it
- probably in, I don't know, I can't speculate, 2012,
- 15 2011.
- 16 Q So you did not write this journal at the
- time it happened?
- 18 A No.
- 19 Q You started writing this journal
- approximately a decade after you claim you finished
- being sexually trafficked, correct?
- 22 A Yes.
- Q And you started writing a journal after
- you had a lawyer, correct?
- 25 A Correct.

We're back on the 1 THE VIDEOGRAPHER: 2 record at 2:55. 3 (BY MS. MENNINGER) Do you have any 0 4 photographs of yourself either nude or in a sexually 5 compromising position that you claim were taken by 6 Ghislaine Maxwell? 7 Α I do not have any of those in my evidence. 8 But if you ask Ghislaine Maxwell, she would have 9 plenty. 10 0 Do you have any in your storage boxes in 11 Sydney? 12 Α No. 13 Do you know whether your attorneys have O 14 any such photographs that you claim were taken by 15 Ghislaine Maxwell? 16 Α No. 17 You don't know or they don't have them? O 18 Α I don't know. And I don't think they have 19 If they had them, they would have told me. 20 You should ask your client. She's got plenty of 21 them. 22 What type of camera did Ghislaine Maxwell Q 23 use? 24 It was a black camera. And it had a, I Α don't know the types and names of them, but the lens 25

1 that goes out. 2 Was it digital or single reflex? 0 3 Α Again, I don't know types of cameras. Ι 4 mean, I use my phone for using a camera. So it's a 5 black camera and it had a lens that you could put out 6 further or bring back. 7 Q Did you ask her to take any photographs of 8 you? 9 Α She asked to take photographs of me. 10 Was it a film or a digital camera? Q 11 Α I never saw how she printed them out. 12 What's the first time you told anybody 0 13 that you had been sexually trafficked? 14 MR. EDWARDS: Form. 15 Α Tony Figueroa, my ex-boyfriend, knew some 16 of the stuff that was happening, though I did not go 17 in great detail to him, being that he's my boyfriend. 18 And then the first person I really opened up to about 19 everything was my husband. 20 (BY MS. MENNINGER) Did you tell Tony 21 Figueroa that you were forced to have sex with 22 Jeffrey Epstein? 23 Α Yes. 24 Did you tell Tony Figueroa you were forced to have sex with Ghislaine Maxwell? 25

1	any interactions with law enforcement?
2	A Yes.
3	Q When?
4	A When I tried to break away from Jeffrey
5	and Ghislaine, I started making myself unavailable.
6	And I got a job at Road House Grill. And Tony used
7	to come pick me up in the afternoons, at nighttime,
8	and he'd sit at the bar. And there's this big cup
9	that's got tips in it.
10	I was in the back room. And I had to
11	first you have to sign out and you have to take off
12	your aprons, put your aprons away. And there's a
13	whole bunch of cleaning up stuff you have to do.
14	In that time period, Tony grabbed money
15	from a cup that had money in it. That was for the
16	bartenders for their tips. My boss called me the
17	next day. He told me that I had stolen the money,
18	which I hadn't. And I came back and I returned the
19	money after I confronted Tony about it. Gave the
20	money back to him and he said, I'm sorry, but it's
21	just law that I have to call the police. So he
22	called the police.
23	And knowing that Jeffrey has got the Palm
24	Beach Police Department in his pocket, I went to
25	Jeffrev Epstein and I told him what had happened.

- And Jeffrey said, Don't worry about it. Let me take
- care of it for you.
- Q Okay. I'm sorry. When did you have
- interaction with law enforcement, then?
- 5 A What year?
- 6 Q Did you speak with a law enforcement
- 7 officer?
- 8 A I don't believe I spoke to them. Jeffrey
- 9 handled everything.
- Q Okay. And you said that you had finished
- your shift at -- this is at the Road House Grill,
- 12 correct?
- 13 A Correct.
- Q You had finished your shift?
- 15 A Yeah, it was the end of the shift.
- Q Okay. And you had cleaned up and were
- 17 checking out, correct?
- 18 A Yeah, it's a completely separate part of
- the -- it's like back of the house. Do you know what
- that means, like in waitering terms?
- Q (Indicating.)
- 22 A Yeah, back of the house.
- Q And what was -- who was this boss that you
- spoke to?
- 25 A I can't remember his name.

1	exclusivity?
2	A Yes.
3	Q What was that period?
4	A I believe it was like a three-month period
5	or something.
6	Q Okay. And what other terms of the
7	contract, do you recall?
8	A I couldn't talk to any other news
9	publication about the story.
10	Q Anything else?
11	A Not that I know of.
12	Q Were you happy when the period was up?
13	A Well, I mean, at that time I wanted to
14	write about my story. So I guess, yes, I was happy
15	when that period was up.
16	Q And you were actively writing a book at
17	that time, correct?
18	A My manuscript. I've never published it.
19	Q You were writing the manuscript at the
20	time of your period of exclusivity with Sharon
21	Churcher, correct?
22	A Those three months were just craziness. I
23	think I started after that.
24	Q You think you started writing the book
25	after the 90 days were up?

1 Α Yeah. 2 And then you attempted to sell that Q 3 manuscript, correct? 4 I didn't attempt to sell it. I went to Α 5 other publications, like, what do you call them? 6 People -- I'm trying to think of the name of the 7 word. People who publish books, not like a newspaper 8 or anything. And I inquired about what they thought 9 of my manuscript and if they thought it was, you 10 know, a good story. And, yeah. 11 Q So you sent the manuscript to these people 12 for the purposes of trying to publish the book, 13 correct? 14 Α Some people, yes. 15 Q And you were trying to get money from the 16 book publication, correct? 17 Well, I wasn't going to sell it to them Α 18 for free. 19 But you were unsuccessful in finding Q 20 someone to publish it, correct? 21 Well, I was always on the fence with it. Α 22 I wasn't too sure if I wanted to or didn't want to. I was more seeking judgment based upon these people 23 24 who have done this plenty and plenty of times. Still to this day, I mean, I've had people 25

1 who have been interested in it and I still don't know if I want to do it yet. I mean, I think there's a 2 3 lot more that can go into it, you know. 4 You were actively sending the manuscript Q 5 to people for purposes of having them reach a deal with you and publish it, correct? 6 7 No deal was ever talked about. What we Α 8 talked about was the possibility of publishing it, is 9 it publishing-worthy, would I need to get a qhostwriter. You know, this is the first time I've 10 11 ever written a manuscript so I didn't know what I was 12 doing. 13 Okay. You contacted Jarred Weisfeld, 0 14 correct? 15 Α Correct. 16 I'm going to mark a document as Q 17 Defendant's Exhibit 16. It is a composite exhibit. 18 (Exhibit 16 marked.) 19 Thank you. MR. EDWARDS: 20 (BY MS. MENNINGER) I'm not going to ask 0 21 you to read every single page of this, but if you 22 look at the first page. 23 Α Um-hum. 24 Can you tell what this is in terms of what type of document? 25

1 calm the anxiety and everything down. 2 Before you met Jeffrey Epstein, had you 3 used any drugs? 4 Sure, yes. Α 5 Which drugs had you used prior to meeting O 6 Jeffrey Epstein? 7 Α I smoked pot. I've taken Ecstasy. 8 Cocaine? 0 9 Α Yeah, I would have snorted cocaine, 10 um-hum. 11 Did you ever abuse alcohol before meeting Q 12 Jeffrey Epstein? 13 No, I was -- I wasn't even of age to be 14 able to buy it. I mean, if there was alcohol at 15 parties I would have drank it, but I wouldn't say I 16 abused it. 17 Okay. Were there ever occasions upon 0 18 which you were observed to be drunk by other people, 19 prior to meeting Jeffrey Epstein? 20 If you're drinking, the possibility of 21 getting drunk is always there. I don't -- I can't 22 recall exact situation where that was the case, 23 but --24 Were you diagnosed as a drug addict prior to meeting Jeffrey Epstein? 25

1	AGREN BLANDO COURT REPORTING & VIDEO, INC.
2	216 - 16th Street, Suite 600 Denver, Colorado 80202
3	4450 Arapahoe Avenue, Suite 100 Boulder, Colorado 80303
4	May 11, 2016
5	Sigrid S. McCawley, Esq. BOIES, SCHILLER & FLEXNER LLP
6	401 East Las Olas Boulevard Suite 1200
7	Fort Lauderdale, FL 33301-2211
8	Re: Videotaped Deposition of VIRGINIA GIUFFRE Giuffre v. Maxwell
9	Case No. 15-cv-07433-RWS
10	The aforementioned deposition is ready for reading and signing. Please attend to this matter by
11	following BOTH of the items indicated below:
12	Call 303-296-0017 and arrange with us to read and sign the deposition in our office.
13	YYY Have the dependent road your gent and gign
14	XXX Have the deponent read your copy and sign the signature page and amendment sheets, if applicable; the signature page is attached.
15	Dood the smallered court of the democities and
16	Read the enclosed copy of the deposition and sign the signature page and amendment sheets, if applicable; the signature page is
17	attached.
18	XXX WITHIN 30 DAYS OF THE DATE OF THIS LETTER
19	By due to a trial date of
20	Please be sure the original signature page and amendment sheets, if any, are SIGNED BEFORE A NOTARY
21	PUBLIC and returned to Agren Blando for filing with the original deposition. A copy of these changes
22	should also be forwarded to counsel of record. Thank you.
23	AGREN BLANDO COURT REPORTING & VIDEO, INC.
24	MORDIN DEANDO COORT RELORITING & VIDEO, INC.
25	cc: All Counsel

GIUFFRE

VS.

MAXWELL

Deposition

VIRGINIA GIUFFRE VOLUME II

11/14/2016

Agren Blando Court Reporting & Video, Inc.

216 16th Street, Suite 600 Denver Colorado, 80202 303-296-0017

IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

CONFIDENTIAL VIDEO DEPOSITION OF VIRGINIA GIUFFRE, VOLUME II

November 14, 2016

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

APPEARANCES:

BOIES, SCHILLER & FLEXNER LLP
By Sigrid S. McCawley, Esq.
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Appearing on behalf of the Plaintiff

1	APPEARANCES: (Continued)
2	HADDON, MORGAN AND FORMAN, P.C.
3	By Laura Menninger, Esq. Jeffrey S. Pagliuca, Esq. 150 East 10th Avenue
4	Denver, CO 80203 Phone: 303.831.7364
5	lmenninger@hmflaw.com jpagliuca@hmflaw.com
6	Appearing on behalf of the Defendant
7	Also Present:
8	Ann Lundberg, Paralegal Maryvonne Tompkins, Videographer
9	nary voime remphrine, vracegrapher
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1 Α Yes. 2 And you believe the Neiman Marcus was Q 3 located in which city? 4 Α Well, it's around Fort Lauderdale. Ι 5 can't tell you exactly. Fort Lauderdale is so big, 6 like Broward County? Is that the word for it? 7 Q And what did you do at Neiman Marcus? 8 Α I worked in the changing rooms. 9 And what did you do in the changing room? Q 10 I think I just like -- if I remember Α 11 right, I just put clothes away that people left in 12 Probably went out to get sizes, different 13 sizes for women who wanted different sizes of the 14 same product. 15 And where did you work after Neiman Q 16 Marcus? 17 Taco Bell. Α 18 Q Did you work at Southeast Employee 19 Management Company? 20 I don't recognize that. I don't know if Α 21 that's a payroll company or what it is. I don't know 22 what Southeast -- what is it called? 23 Q Southeast Employee Management Company. 24 No, I don't remember that. Α 25 O Did you ever work as a temp?

1 Α Not that I remember. 2 Going to different offices and filling in? Q 3 Α No. 4 Did you work for Oasis Outsourcing? Q 5 I don't -- I don't know if that's a Α 6 payroll company or if that's an actual place, but 7 that doesn't ring a bell. 8 Did you -- do you know how much you got 0 9 paid when you were working at places like Oasis 10 Outsourcing? 11 Well, considering I don't know if I worked Α 12 at Oasis Outsourcing, I wouldn't even know how much I 13 got paid. 14 Q Did you review your Social Security 15 records? 16 Α Yes. 17 You saw Oasis Outsourcing listed there? O 18 Α Right, but like I said, it doesn't even 19 ding a bell at all. 20 Do you know how much money they said you 21 made from them? 22 MS. MCCAWLEY: Objection. If you want to show her the documents, she can see what amount is 23 24 listed and answer your questions, but if you're not going to show her the document, that's the best she 25

- 2 A Yeah, if you could. I'm happy to answer 3 your questions. I want to be helpful, so...
- Q (BY MS. MENNINGER) Great. Well, do you remember how much money you made from Oasis
- 6 Outsourcing?

can do.

1

- A Like I said, I don't even remember working
 for Oasis Outsourcing, or what it is, so I couldn't
 tell you.
- 10 Q Do you remember how much money you were
 11 making per hour at Neiman Marcus?
- 12 A No, not off the top of my head.
- Q Do you know how many months you worked there?
- 15 A Not long. I'd probably say -- I mean, I

 16 don't know. I'm not going to guess. But around the

 17 three-month mark would be my -- I don't know the

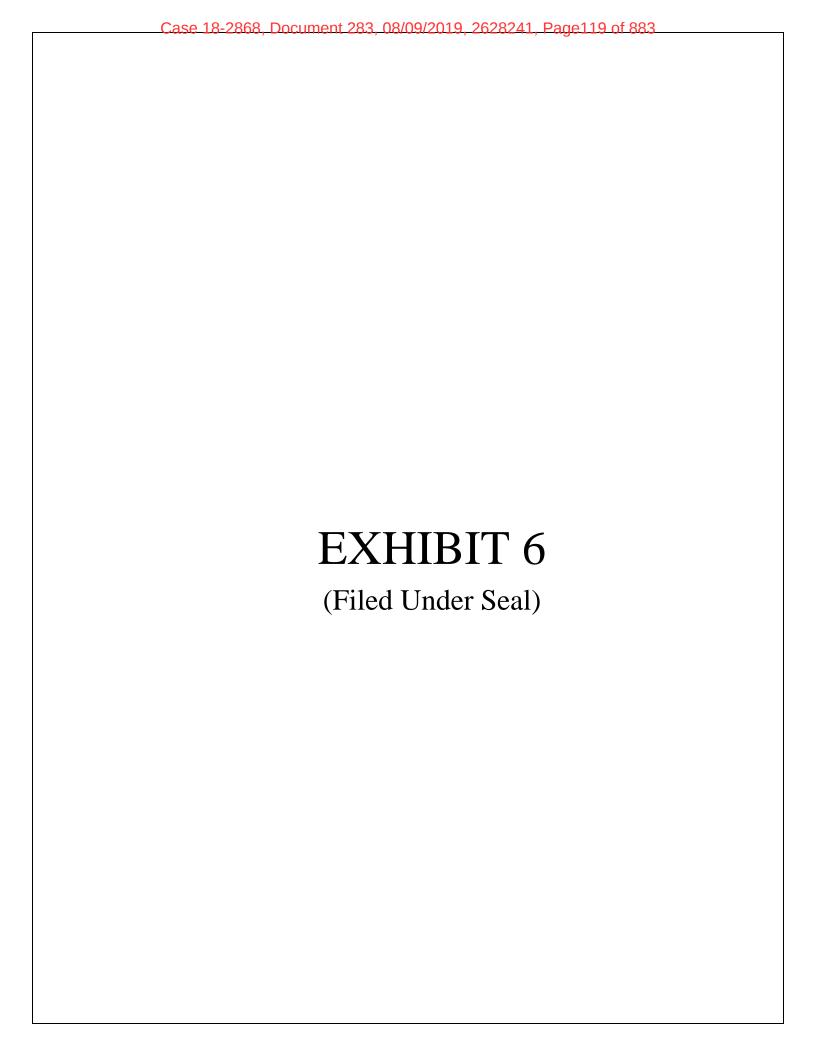
 18 exact answer.
- 19 Q Do you remember any of your coworkers?
- 20 A No.
- Q Did you work at Mannino's?
- 22 A Briefly, yes.
- Q What is Mannino's?
- A A cute little Italian restaurant in
- Wellington.

- 1 Q And what did you do at Mannino's?
- 2 A I did waitressing.
- 3 Q And how much did you make?
- 4 A Oh, I don't know. I don't remember.
- 5 Q Did you work at TGI Fridays?
- A Again, very shortly. Short time period,
- 7 and I was a waitress again.
- 8 Q And how much did you make there?
- 9 A I have no idea.
- 10 Q Did you get fired?
- 11 A No.
- 12 Q Why did you leave?
- 13 A I was -- that's around the time period
- that I was approached by -- I can't remember his
- name, but he owned a veterinary clinic or he was a
- vet, one of the two, and he offered me to come work
- for him.
- Q When you were working at TG -- TGI
- 19 Fridays, were you also working at the Roadhouse
- 20 Grill?
- 21 A No.
- Q Those were not at the same time?
- 23 A I don't know. I don't think so. Maybe
- consecutively like after each other.
- Q Do you recall working at the Roadhouse

1 Grill? 2 Α Yes. 3 And why did you leave there? Q 4 Α We all know that the thing that went down 5 there. Tony picked me up and took some money out of a jar, and then I went to go give it back to the guy, 6 7 thinking that it would be all right, and it wasn't. 8 So I got fired, I think. 9 Sure. Okay. I show you some -- are we on Q 10 9? 11 MR. PAGLIUCA: Yes, 9. 12 (BY MS. MENNINGER) I'd like to show you 0 13 Defendant's Exhibit 9. 14 (Exhibit 9 marked.) 15 THE DEPONENT: Thank you. 16 Q (BY MS. MENNINGER) Do you recognize your 17 handwriting on this document? 18 Α Yes. 19 Did you fill out an application for Q 20 employment --21 Α Yes. 22 -- on March 26th of 2002? Q 23 Α Yes. 24 And where were you living at that time? Q 25 I've put down my parents' address, but I Α

- and seasonal employee, correct?
- 2 A Correct.
- 3 Q And your dad was a full-time year-round
- 4 employee, right?
- 5 A Yes.
- 6 Q He worked there all the time.
- 7 A Yes.
- 8 Q And your job was a seasonal employment.
- 9 A Well, as far as I know --
- MS. MCCAWLEY: Objection.
- 11 A -- I was hired for the summer, so...
- 12 Q (BY MS. MENNINGER) Right. Okay. So the
- work hours, in the next paragraph, what -- what is
- that -- can you just read that bottom paragraph for
- 15 us?
- 16 A "The Club never shuts down from
- November 1st to Mother's Day; for 24 hours a day, 7
- days a week, it serves the diverse needs of our
- members. Therefore to ensure the adequate coverage
- at all times, departments have arranged different
- schedules for their employees."
- Q Okay. I'm going to show you Defendant's
- Exhibit 20.
- 24 A Close this one?
- Q Yeah.

1	STATE OF COLORADO)
2) ss. REPORTER'S CERTIFICATE
3	COUNTY OF DENVER)
4	I, Pamela J. Hansen, do hereby certify that
5	I am a Registered Professional Reporter and Notary
6	Public within the State of Colorado; that previous to
7	the commencement of the examination, the deponent was
8	duly sworn to testify to the truth.
9	I further certify that this deposition was
10	taken in shorthand by me at the time and place herein
11	set forth, that it was thereafter reduced to
12	typewritten form, and that the foregoing constitutes
13	a true and correct transcript.
14	I further certify that I am not related to,
15	employed by, nor of counsel for any of the parties or
16	attorneys herein, nor otherwise interested in the
17	result of the within action.
18	In witness whereof, I have affixed my
19	signature this 23rd day of November, 2016.
20	My commission expires September 3, 2018.
21	
22	Damola I Hangon CDD DDD DMD
23	Pamela J. Hansen, CRR, RPR, RMR 216 - 16th Street, Suite 600
24	Denver, Colorado 80202
25	



ROSS NEIL SUTHERLAND GOW 11/18/2016

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1
                    IN THE HIGH COURT OF JUSTICE
                       OUEEN'S BENCH DIVISION
 2
 3
                        Claim No. CR 2016 624
 4
     BETWEEN:
 5
                         VIRGINIA L. GIUFFRE
                                                  Applicant,
 6
                                 and
 7
                               ROSS GOW,
                                                 Respondent.
 8
 9
     AND:
                    UNITED STATES DISTRICT COURT
10
                    SOUTHERN DISTRICT OF NEW YORK
11
12
     Virginia L. Giuffre,
                 Plaintiff,
13
                    v.
                                     Case No. 15 cv 07433 RWS
14
        Ghislaine Maxwell,
                Defendant.
15
16
17
                     Friday, November 18, 2016
18
                            AT: 8:27 a.m.
                               Taken at:
19
20
21
                         Essex Chambers 29,
                         81 Chancery Lane,
22
                        London, UK, WC2A 1DD
23
24
     Court Reporter: Lisa Barrett, Accredited Real time
     Reporter
25
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1	Α.	No, I have not.	08:31:58
2	Q.	When you met her last night, did she assist you	08:32:01
3	in prepar	ation for this deposition?	08:32:04
4	A.	No.	08:32:07
5	Q.	Did she tell you anything about this case?	08:32:10
6	A.	No.	08:32:13
7	Q.	Do you know Ghislaine Maxwell?	08:32:20
8	A.	I do know Ms. Maxwell, yes.	08:32:24
9	Q.	How did you meet her?	08:32:26
10	A.	I met her in the offices of Devonshires law	08:32:27
11	firm on o	r around March 2011.	08:32:31
12	Q.	So your first meeting was in person?	08:32:37
13	A.	First meeting was in person, yes.	08:32:41
14	Q.	Had you spoken to her prior to that?	08:32:42
15	A.	I believe that the very first engagement was	08:32:45
16	I was int	roduced to her by my chairman Brian Basham but	08:32:50
17	I believe	the first words we had were in the Devonshire	08:32:54
18	law offic	e.	08:32:58
19	Q.	Did Ms. Maxwell retain the services of you or	08:33:00
20	your firm	?	08:33:03
21	A.	Yes, she did.	08:33:04
22	Q.	And was that in March of 2011?	08:33:06
23	A.	It was.	08:33:09
24	Q.	Do you have a written agreement?	08:33:11
25	A.	We did have a written agreement but I can no	08:33:14

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1	longer locate that agreement.	08:33:16
2	Q. Was that agreement ever renewed?	08:33:19
3	A. It was renewed, I believe on or around the	08:33:21
4	beginning of January 2015, potentially the 2nd of January	08:33:26
5	via email.	08:33:32
6	Q. Was the agreement revised when it was renewed?	08:33:34
7	A. It wasn't revised. It was a straightforward	08:33:38
8	re-establishment of the original agreement.	08:33:42
9	Q. Is it your belief that that agreement was in	08:33:45
10	effect on January 2nd, 2015?	08:33:49
11	A. Yes.	08:33:53
12	Q. Do you recall the terms of that agreement?	08:33:59
13	A. Well, it was a re-establishment of an existing	08:34:03
14	agreement so if we go back to the original agreement, it	08:34:06
15	was to provide public relations services to Ms. Maxwell	08:34:08
16	in the matter of Guiffre and her activities.	08:34:13
17	MS. SCHULTZ: I'm marking as Exhibit 2, a	08:34:29
18	document labeled GM 00068.	08:34:31
19	(Exhibit 2 was marked for identification)	08:30:48
20	MR. DYER: Why don't you start making a pile of	08:34:38
21	them, Mr. Gow, because it may be that later on you'll be	08:34:40
22	asked to go back to them.	08:34:43
23	THE WITNESS: Yes, sir.	08:34:44
24	MR. DYER: You don't have copies for me of	08:34:55
25	these documents?	08:34:57

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1	MS. SCHULTZ: I do not have any more copies on	08:34:58
2	that.	08:34:59
3	MR. DYER: No, no, no, it's much more important	08:35:00
4	that just for the purpose of following things, it's	08:35:00
5	easier.	08:35:03
6	BY MS. SCHULTZ:	08:35:12
7	Q. Is ross@acuityreputation.com your email	08:35:12
8	address?	08:35:15
9	A. It is, my business email, yes.	08:35:16
10	Q. Did you send the email depicted in this	08:35:18
11	document?	08:35:21
12	A. Yes, I did.	08:35:26
13	Q. Did you send it on January 2nd, 2015?	08:35:27
14	A. I believe I did.	08:35:31
15	Q. When you sent that email were you acting	08:35:34
16	pursuant to Ms. Maxwell's retention of your services?	08:35:36
17	A. Yes, I was.	08:35:41
18	Q. Could you please tell me everything you know	08:35:58
19	about Virginia Roberts Guiffre.	08:36:00
20	MS. MENNINGER: Objection, foundation and form.	08:36:09
21	MR. DYER: You may answer.	08:36:11
22	BY MS. SCHULTZ:	08:36:11
23	Q. You testified earlier that you were retained	08:36:12
24	MR. DYER: Are you withdrawing that question?	08:36:15
25	BY MS. SCHULTZ:	08:36:17

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1	Q. No, I'm not, I'm not. Please I am	08:36:17
2	withdrawing that question.	08:36:20
3	MR. DYER: Alright.	08:36:20
4	MS. SCHULTZ: I am withdrawing that question.	08:36:20
5	BY MS. SCHULTZ:	08:36:22
6	Q. You testified previously that you were retained	08:36:22
7	to handle matters relating to Virginia Roberts Guiffre;	08:36:24
8	is that correct?	08:36:29
9	A. Correct.	08:36:30
10	Q. Okay. So you are aware of who Ms. Roberts	08:36:31
11	Guiffre is?	08:36:35
12	A. I am.	08:36:36
13	Q. Okay. Please tell me everything you know about	08:36:37
14	Virginia Roberts Guiffre, please.	08:36:39
15	MS. MENNINGER: Objection, foundation, form,	08:36:42
16	and may call for privileged materials.	08:36:43
17	BY MS. SCHULTZ:	08:36:45
18	Q. You can answer to the extent that anything	08:36:46
19	you testify to is not protected by a privilege.	08:36:48
20	A. Ms. Roberts first came to my attention on or	08:36:58
21	around March 2011 when I was called into a meeting with	08:37:03
22	Philip Barden and Ms. Maxwell at Devonshires law office,	08:37:08
23	that she had made Ms. Guiffre had made extremely	08:37:14
24	unpleasant allegations about Ms. Maxwell's private life.	08:37:20
25	We were Acuity Reputation, my firm	08:37:26

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1	was called in to protect Ms. Maxwell's reputation, and	08:37:29
2	to set the record straight. That was and that work	08:37:33
3	commenced on or around March of 2011.	08:37:42
4	Q. What do you mean by "set the record straight"?	08:37:46
5	A. Ms. Guiffre's allegations about Ms. Maxwell	08:37:51
6	were, we believe, and to this day continue to believe,	08:37:55
7	untrue, defamatory, and fantastical. And with	08:37:58
8	Devonshires' lawyers, we set about putting out	08:38:09
9	crafting a statement which would put Ms. Maxwell's point	08:38:15
10	of view across that Ms. Guiffre's allegations were untrue	08:38:19
11	and, frankly, abhorrent.	08:38:25
12	Q. What advice did you give Miss Maxwell as part	08:38:28
13	of your retention?	08:38:31
14	A. It is standard procedure in cases where it's	08:38:32
15	understood that a party may be defaming one's client that	08:38:36
16	one puts out a statement correcting those allegations and	08:38:42
17	providing a clearer picture of where the truth lies. So	08:38:46
18	it was very much our counsel that Ms. Maxwell put out a	08:38:49
19	statement, vehemently denying the allegations.	08:38:55
20	Q. When you testified that Ms. Guiffre, I'm going	08:38:59
21	to refer to her by just her married name, came to your	08:39:03
22	attention at that March 2011 meeting at Devonshires with	08:39:06
23	Mr. Barden and Ms. Maxwell, correct, and you learned	08:39:12
24	about her at that meeting; is that correct?	08:39:16
25	A. Correct.	08:39:18

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1	remaining, so	08:58:14
2	I've marked as Exhibit 3 RG(UK) 00002. Do you	08:58:15
3	recognize this email?	08:58:47
4	A. I do.	08:58:48
5	Q. Did you receive this email?	08:58:49
6	A. I did, on the on New Year's Day 2015.	08:58:50
7	Q. Did you contact Ms. Maxwell after receiving	08:58:57
8	this email?	08:58:58
9	A. I did.	08:58:59
10	Q. Did you make any response to Mr. Ball in any	08:59:19
11	form?	08:59:22
12	A. I did.	08:59:22
13	Q. Can you tell me what you what response you	08:59:25
14	made?	08:59:26
15	A. Well, the response to Mr. Ball was part of a	08:59:27
16	series of responses having spoken to my client within 24	08:59:33
17	hours or so, we got back to Mr. Ball with an agreed	08:59:41
18	statement which went out to a number of media.	08:59:44
19	Q. When you say "agreed statement" can you tell me	08:59:50
20	more about what you mean? Who agreed to the statement?	08:59:52
21	A. I need to give you some context, if I may,	08:59:58
22	about that statement.	09:00:01
23	So, this is on New Year's Day. I was	09:00:02
24	in France so the email time here of 21:46, in French	09:00:04
25	time was 22:46, and I was getting up early the next	09:00:10

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1	morning to drive my family back from the south of	09:00:14
2	France to England, which is a 14-hour journey, door to	09:00:17
3	door. So on the morning of the 2nd of January,	09:00:22
4	bearing in mind that Ms. Maxwell, I think was in New	09:00:26
5	York then, she was five hours behind, so there was	09:00:28
6	quite a lot of, sort of time difference between the	09:00:30
7	various countries here, I sent her an email, I	09:00:35
8	believe, saying parsing this forwarding this	09:00:38
9	email to her saying "How do you wish to proceed?" And	09:00:41
10	then I was on the telephone I had two telephones in	09:00:45
11	the car, I received in excess of 30 phone calls from	09:00:50
12	various media outlets on the 2nd of January, all	09:00:54
13	asking for information about how Ms. Maxwell was	09:01:00
14	looking to respond to the latest court filings, which	09:01:04
15	were filed on the 30th of December as I understand.	09:01:10
16	And by close towards close of play	09:01:13
17	on the 2nd, I received an email forwarded by	09:01:16
18	Ms. Maxwell, containing a draft statement which my	09:01:33
19	understanding was the majority of which had been	09:01:36
20	drafted by Mr. Barden with a header along the lines of	09:01:39
21	"This is the agreed statement." At close of play on	09:01:44
22	the 2nd.	09:01:48
23	So I I was I had gone under the	09:01:50
24	Channel Tunnel and I was sitting on the other side and	09:01:54
25	that email, which my understanding was that it had	09:01:57

ROSS NEIL SUTHERLAND GOW 11/18/2016 Page 33 been signed off by the client, effectively, was then 09:02:01 1 sent out to a number of media, including Mr. Ball and 2 09:02:05 various other UK newspapers. 09:02:09 3 Mr. Gow, when you say "end of play" and "close 09:02:12 4 of play," are you referring to sending the email that's 09:02:15 5 Exhibit 2? 6 09:02:18 7 Α. Yes, I am. 09:02:24 MR. DYER: My understanding is that it went to 09:02:29 8 people other than those listed? 09:02:30 9 10 THE WITNESS: Yes, that is --09:02:32 11 MR. DYER: Just a sample. 09:02:34 12 That is a sample. Everyone who 09:02:35 THE WITNESS: effectively -- well, the detail on this, I was driving, 13 09:02:37 so my eldest son in the back had my BlackBerry and was 14 09:02:40 15 trying to capture -- it was a pretty chaotic day. 09:02:43 Most people in the UK were on holiday. In fact, 09:02:48 16 17 it was a holiday weekend, our office was closed, my PA was 09:02:50 18 on holiday, so my son was basically doing an internship in 09:02:54 the back of the car, downloading the names of the callers 09:02:58 19 from various media outlets and -- so we had a list of 2.0 09:03:02 21 those so when I got to the car park, at the end of the 09:03:05 Eurotunnel thing in the UK, I had numerous names, so the 22 09:03:09 email went out to a wide range of people. 23 09:03:14 But the 30 or so calls I had is an aggregate 24 09:03:17 25 number, so there might have been five calls from the BBC 09:03:20

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1	10 more seconds.	09:19:50
2	MS. SCHULTZ: Understood, and I apologize.	09:19:52
3	MR. SPEARMAN: This is what, Exhibit 9?	09:19:54
4	MR. DYER: Yes.	09:19:56
5	MS. SCHULTZ: Yes.	09:19:56
6	(Exhibit 9 was marked for identification.)	09:19:56
7	BY MS. SCHULTZ:	09:20:01
8	Q. This also appears to be an email chain with you	09:20:02
9	and Ms. Maxwell; is that correct?	09:20:05
10	A. It does appear to be so.	09:20:07
11	Q. Did you send the top email of the chain that	09:20:08
12	says "Okay, G, going with this"?	09:20:10
13	A. I did.	09:20:13
14	Q. And did you receive from Ms. Maxwell, the	09:20:14
15	bottom email of that chain?	09:20:16
16	A. I believe so. Well, I believe yes, yeah, it	09:20:17
17	was forwarded from Ms. Maxwell, yes.	09:20:21
18	MR. DYER: Sorry, I don't quite understand that	09:20:29
19	answer.	09:20:31
20	THE WITNESS: I misspoke that. I did receive	09:20:33
21	it from Ms. Maxwell.	09:20:34
22	MR. DYER: Okay.	09:20:38
23	BY MS. SCHULTZ:	09:20:38
24	Q. The subject line does have "FW" which to me	09:20:39
25	indicates it's a forward. Do you know where the rest of	09:20:42

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1	this email chain is?	09:20:45
2	A. My understanding of this is: It was a holiday	09:20:49
3	in the UK, but Mr. Barden was not necessarily accessible,	09:20:54
4	at some point in time, so this had been sent to him	09:20:59
5	originally by Ms. Maxwell, and because he was	09:21:03
6	unavailable, she forwarded it to me for immediate action.	09:21:07
7	I therefore respond, "Okay, Ghislaine, I'll go with	09:21:14
8	this."	09:21:19
9	It is my understanding that this is	09:21:20
10	the agreed statement because the subject of the second	09:21:22
11	one is "Urgent, this is the statement" so I take that	09:21:24
12	as an instruction to send it out, as a positive	09:21:27
13	command: "This is the statement."	09:21:30
14	Q. Okay.	09:21:33
15	A. And I say, "Thanks, Philip" because I'm aware	09:21:33
16	of the fact that he had a hand, a considerable hand in	09:21:37
17	the drafting.	09:21:40
18	Q. Okay. Could I ask you to please refer back to	09:21:41
19	Exhibit 2. Looking also at Exhibit 9, Exhibit 9 appears	09:21:47
20	to have five sentences in it. Do you agree that those	09:22:03
21	same five sentences are part of the communication that is	09:22:10
22	borne in Exhibit 2?	09:22:13
23	A. Sorry, could you say that again. I'm just	09:22:18
24	following what your	09:22:20
25	Q. It was a bad question. Let me try that again.	09:22:21

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1	Q. Okay. Have you ever communicated anything	09:54:42
2	regarding Ms. Guiffre's criminal allegations to the press	09:54:52
3	or the media?	09:54:56
4	A. As part of a wider conversation about her	09:54:58
5	unsavory allegations about Ms. Maxwell, it's possible	09:55:04
6	that I might have done, but I can't recall the detail,	09:55:08
7	I'm afraid.	09:55:11
8	Q. Do you do you remember discussing that with	09:55:12
9	The Guardian?	09:55:20
10	A. No, I don't. I'm not saying I didn't but I	09:55:26
11	can't recall. You have to bear in mind, if you'd be so	09:55:29
12	kind, that I've been speaking to over 30 journalists and	09:55:34
13	media outlets about this, and I can't recall every single	09:55:39
14	the detail of every single conversation.	09:55:41
15	Q. Earlier you testified with regard to Exhibit 2	09:55:44
16	that in the days following sending that email, you also	09:55:47
17	communicated with other press and media outlets. Do you	09:55:53
18	recall today any of the other press and media outlets you	09:55:58
19	communicated with, in addition to those listed at the top	09:56:02
20	of that email?	09:56:07
21	A. The Guardian, The Sun, from the top of my	09:56:07
22	memory, but in addition to in addition to emails there	09:56:14
23	would have been telephone calls and I'm there may not	09:56:21
24	be a transcript of those calls, these are emails inter	09:56:25
25	alia, others, and I can't recall every single email that	09:56:33

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1	from John Swain?	09:58:42
2	A. I believe I did.	09:58:44
3	Q. That's all the questions I have about that	09:58:49
4	document.	09:58:51
5	A. Thank you.	09:58:52
6	Q. Regarding communications you made after sending	09:59:05
7	the email in Exhibit 2, I believe, and please correct me	09:59:08
8	if I'm wrong, you testified that you received 30 or more	09:59:14
9	calls that were that you would classify as press	09:59:17
10	inquiries regarding Ms. Guiffre; is that correct?	09:59:20
11	A. Yes.	09:59:23
12	Q. Do you recall emailing the statement to other	09:59:24
13	entities beyond what is on the list on Exhibit 2?	09:59:29
14	A. Yes, I think I answered that previously. Yes,	09:59:33
15	I mean there is a far I said inter alia, so there is a	09:59:36
16	wider range of people that I would have emailed it to in	09:59:40
17	response to incoming queries	09:59:43
18	Q. Do you	09:59:46
19	A. But I	09:59:46
20	Q. Sorry.	09:59:47
21	A. I can't remember every single one.	09:59:48
22	Q. Do you recall ever reading the statement to the	09:59:50
23	press or the media over the phone?	09:59:52
24	A. It's very possible that I would have done so,	09:59:56
25	yes.	09:59:57

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1	MR. DYER: Do you mean Exhibit 2?	09:59:58
2	MS. SCHULTZ: Yes. Exhibit 2.	10:00:00
3	THE WITNESS: To be clear, Exhibit 2 was the	10:00:02
4	base document.	10:00:03
5	MS. SCHULTZ: Uh-hmm.	10:00:05
6	THE WITNESS: In addition to the 2011 March	10:00:05
7	statement. Those were the two working documents that	10:00:10
8	were always referred to, both of which well, the first	10:00:15
9	one was in a public domain and was on record on the	10:00:17
10	Devonshires on with Devonshires name at the top on	10:00:21
11	PR Newswire which is a global delivery service. So that	10:00:24
12	was easily accessible by people. And the second one was	10:00:28
13	the further to the 2nd of January 2015.	10:00:31
14	BY MS. SCHULTZ:	10:00:38
15	Q. To the extent you can recall or could estimate,	10:00:37
16	how many other emails do you believe you sent bearing	10:00:40
17	that statement that's in Exhibit 2?	10:00:43
18	A. I really can't remember but certainly more than	10:00:47
19	six and probably less than 30, somewhere in between.	10:00:48
20	Any time there was an incoming query	10:00:52
21	it was either dealt with on the telephone by referring	10:00:54
22	them back to the two statements of March 2011 and	10:00:57
23	January 2015 or someone would email them the	10:01:00
24	statement. So no one was left unanswered, broadly, is	10:01:06
25	the is where we were. But I can't remember every	10:01:09

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1	single person we reached out to.	10:01:13
2	Q. Okay. So is it your testimony that you reached	10:01:19
3	out to individuals who did not first contact you?	10:01:22
4	A. No. We were in response mode.	10:01:26
5	Q. Okay.	10:01:28
6	A. There was enough to do responding to incoming	10:01:29
7	queries, I wouldn't have been making more work, to be	10:01:33
8	honest.	10:01:38
9	Q. Alright.	10:01:38
10	MR. DYER: So journalists paid no attention to	10:01:42
11	your "No further communication will be provided on the	10:01:44
12	matter."	10:01:47
13	A. No that's quite correct, sir, and there	10:01:48
14	probably was a it's regarded as tweaking their tales.	10:01:50
15	BY MS. SCHULTZ:	10:02:00
16	Q. Mr. Gow, I'm handing you what I've marked as	10:02:00
17	Exhibit 14. The Bates number is RG(UK) 000004. I'll	10:02:04
18	give you a moment to look at it.	10:02:17
19	(Exhibit 14 was marked for identification.)	10:02:19
20	BY MS. SCHULTZ:	10:02:43
21	Q. Thank you. Toward the top of the page there is	10:02:44
22	a passage that reads:	10:02:47
23	"Apologies, should read	10:02:49
24	Virgina Roberts all the way	10:02:51
25	through." [As read]	10:02:53

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1	servicing ultra high net worth clients, individuals,	11:23:14
2	corporates, governments and NGOs, managing their media	11:23:20
3	relations and protecting their reputation.	11:23:25
4	Q. Approximately how long have you been providing	11:23:27
5	such services?	11:23:30
6	A. Acuity was set up in 2010.	11:23:31
7	(Exhibit 26 was marked for identification.)	11:23:42
8	BY MS. SCHULTZ:	
9	Q. I'm going to hand you what I've marked as	11:23:37
10	Exhibit 26.	11:23:39
11	A. Thank you.	11:23:43
12	Q. Does this document fairly depict pages from	11:23:53
13	your from Acuity Reputation's website?	11:23:55
14	A. It does.	11:23:59
15	Q. Do you see where it says "We manage reputation	11:24:02
16	and forge opinion through public relations, strategic	11:24:06
17	communications and high level networking"?	11:24:10
18	A. I do.	11:24:13
19	Q. Is that a true statement?	11:24:13
20	A. Say it again. Sorry.	11:24:15
21	Q. Is that a true statement?	11:24:17
22	A. It is, yes. I wrote that statement.	11:24:18
23	MR. DYER: Sorry, you read it or you wrote it?	11:24:20
24	THE WITNESS: I wrote it, so I do recognize it.	11:24:22
25	BY MS. SCHULTZ:	11:24:28

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1	Q. Is it correct that public relations and	11:24:29
2	strategic communications are things that you personally	11:24:31
3	do as part of your professional activities?	11:24:36
4	A. I personally I'm involved in public	11:24:40
5	relations and strategic communications, yes.	11:24:44
6	Q. Is it correct that the media is the intended	11:24:48
7	recipient of this strategic communications.	11:24:51
8	A. It's the it's a larger ground than just	11:24:55
9	the media. There may be lobbyists, government think	11:24:59
10	tanks, focus groups, government departments.	11:25:05
11	Q. Would it be fair to say that the media is often	11:25:09
12	the intended recipient of strategic communications?	11:25:12
13	A. It is a frequent recipient.	11:25:16
14	Q. Referent recipient?	11:25:18
15	A. But not the sole recipient.	11:25:21
16	Q. Okay. Do you see where your website claims	11:25:23
17	that your company has "excellent relationships with the	11:25:25
18	media"?	11:25:28
19	A. I do.	11:25:30
20	Q. Is that a true statement?	11:25:31
21	A. That is true, yeah.	11:25:33
22	MR. DYER: Except Mr. Syson.	11:25:37
23	THE WITNESS: Except Mr. Syson, sir.	11:25:38
24	MS. SCHULTZ: Of course.	11:25:40
25	THE WITNESS: And representatives of the Daily	11:25:40

	<u> </u>	1
1	Mirror.	11:25:41
2	BY MS. SCHULTZ:	11:25:42
3	Q. Is it correct that you advertise your	11:25:42
4	"excellent relationships with the media" because your	11:25:46
5	services often include giving communications to the media	11:25:49
6	on behalf of your clients?	11:25:52
7	A. Yes.	11:25:55
8	MS. SCHULTZ: That's all I have for right now.	11:25:59
9	MR. DYER: I just wanted to ask you one	11:26:01
10	question about Exhibit 25. This was the email from the	11:26:03
11	New York Daily News to you which you sent on to	11:26:13
12	Ms. Maxwell and Mr. Barden.	11:26:17
13	THE WITNESS: Yes.	11:26:20
14	MR. DYER: Do you recollect whether you were	11:26:29
15	asked to make any statement in response to this matter,	11:26:30
16	the issue of proceedings in September of last year?	11:26:35
17	THE WITNESS: I don't, sir. It's always been	11:26:40
18	the case that Mr. Barden and I were encouraging	11:26:45
19	Ms. Maxwell to make a statement, but she was very	11:26:50
20	reluctant to do so.	11:26:57
21	MR. DYER: Right. I think you've got him to	11:27:00
22	accept that up until some time March, April, May, he may	11:27:02
23	have spoken to Mr. Syson. And that was the last	11:27:06
24	statement that there's any evidence of him making about	11:27:10
25	this matter. But on the evidence, as I understand it,	11:27:14

1	CERTIFICATE OF COURT REPORTER
2	
3	I, Lisa M. Barrett, an Accredited Real-time Reporter,
4	hereby certify that the testimony of the witness Ross
5	Neil Sutherland Gow in the foregoing transcript,
6	numbered pages 1 through 122, taken on this 18th day
7	of November, 2016 was recorded by me in machine
8	shorthand and was thereafter transcribed by me; and
9	that the foregoing transcript is a true and accurate
10	verbatim record of the said testimony.
11	
12	
13	I further certify that I am not a relative, employee,
14	counsel or financially involved with any of the
15	parties to the within cause, nor am I an employee or
16	relative of any counsel for the parties, nor am I, in
17	any way, interested in the outcome of the within
18	cause.
19	
20	
21	Signed:
22	Name: Lisa M. Barrett, RPR, CRR, CRC, CSR
23	Date:
24	
25	

Case 18-2868, Docun	nent 283, 08/09/2019	2628241 Page1	39 of 883	
	 	, · ,		
	EXHIB	IT 7		
	(Filed Unde	r Seal)		

Page 1

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----x

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----x

June 20, 2016 9:12 a.m.

CONFIDENTIAL

Deposition of pursuant to notice, taken by Plaintiff, at the offices of Podhurst Orseck, 25 West Flagler Street, Suite 800, Miami, Florida, before Kelli Ann Willis, a Registered Professional Reporter, Certified Realtime Reporter and Notary Public within and for the State of Florida.



Page 54 1 - CONFIDENTIAL BY MR. EDWARDS: 2 3 Ο. When you got to his house, you were 4 requested to give a massage? MR. PAGLIUCA: Object to foundation and 5 6 form. THE WITNESS: I don't exactly remember. 7 Ι don't remember if I was asked in the kitchen. 8 I don't remember if -- I don't remember. 10 BY MR. EDWARDS: 11 Massage was part of the game, though? 12 MR. PAGLIUCA: Object to form and 13 foundation. THE WITNESS: I don't remember. 14 I'm 15 sorry. 16 BY MR. EDWARDS: But even during this deposition today, we 17 have described at times you giving him a massage? 18 Yes. You're asking about my first 19 20 encounter, though. 21 Sorry, I'm just trying to sum up the whole 22 thing. 23 Α. Okay. 24 Was massage part of the lure to get you 25 specifically to his house?



	Page 55
1	- CONFIDENTIAL
2	A. Yes.
3	MR. PAGLIUCA: Object to form and
4	foundation.
5	BY MR. EDWARDS:
6	Q. And at the time, you are 15, 16 or 17
7	years old?
8	MR. PAGLIUCA: Object to form and
9	foundation.
10	THE WITNESS: Yes.
11	BY MR. EDWARDS:
12	Q. No massage experience?
13	A. No.
14	Q. You were told to bring other girls to his
15	house?
16	MR. PAGLIUCA: Object to form and
17	foundation.
18	THE WITNESS: After a while, yes.
19	BY MR. EDWARDS:
20	Q. These massages were turned sexual by
21	Jeffrey, as opposed to by anyone else?
22	A. Jeffrey took my clothes off without my
23	consent the first time I met him.
24	Q. The massages were scheduled by people
25	working for Jeffrey?



	Page 56
1	- CONFIDENTIAL
2	A. I don't recall.
3	MR. PAGLIUCA: Object to form and
4	foundation.
5	BY MR. EDWARDS:
6	Q. Jeffrey Epstein, during these massages,
7	would use sex toys or have sex toys used?
8	MR. PAGLIUCA: Object to form and
9	foundation.
10	THE WITNESS: Well, at that point, it's no
11	longer a massage. Something else is going on.
12	But, yes, he would take out adult toys and
13	different things.
14	BY MR. EDWARDS:
15	Q. While you were a teenager, Jeffrey Epstein
16	asked you to live with him?
17	A. Yes. He wanted me to be emancipated.
18	Q. Jeffrey Epstein encouraged girl-on-girl
19	sex?
20	MR. PAGLIUCA: Object to form and
21	foundation.
22	THE WITNESS: Yes.
23	BY MR. EDWARDS:
24	Q. And after you cooperated with the police,
25	you were intimidated by people working for Jeffrey



	Page 57
1	- CONFIDENTIAL
2	Epstein?
3	MR. PAGLIUCA: Object to form and
4	foundation.
5	THE WITNESS: Yes.
6	MR. EDWARDS: All right. I don't have
7	anything further for you. I apologize that we
8	even had to go through this, all right?
9	THE WITNESS: Okay.
10	EXAMINATION
11	BY MR. PAGLIUCA:
12	Q. Ms. , by name is Jeff Pagluica. I
13	live in Denver, Colorado. And, like you, I don't
14	want to be here today either, okay? I would rather
15	be in Denver.
16	I just want to as I understand it, and
17	I'm not trying to get into any of your treatment
18	over the last, let's say, 10 years, because I don't
19	know how long it's been, but as I understand what
20	you and your lawyer have said here today, you have
21	been involved in some number of years of therapy, in
22	which the purpose part of the purpose of the
23	therapy has been to forget all of these events that
24	Mr. Edwards was asking you questions about; is that
25	correct?



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Page 71
 1
                                  - CONFIDENTIAL
 2.
                      CERTIFICATE OF OATH
 3
     STATE OF FLORIDA
 4
     COUNTY OF MIAMI-DADE
                             )
 5
                 I, the undersigned authority, certify that
                      personally appeared before
 6
                                                       me and
        was duly sworn.
 7
                 WITNESS my hand and official seal
                                                         this
        23rd day of June, 2016.
 8
 9
                     Kelli Ann Willis, RPR, CRR
10
                     Notary Public, State of Florida
                     Commission FF928291, Expires 2-16-20
11
                    + + + + + + + + + + + + + +
12
                           CERTIFICATE
13
     STATE
            OF
                 FLORIDA
14
     COUNTY OF MIAMI-DADE )
15
                 I, Kelli Ann Willis, Registered
        Professional Reporter and Certified Realtime
16
        Reporter do hereby certify that
        authorized to and did stenographically report the
17
        foregoing deposition of
                                                 that a
        review of the transcript was not requested; and
        that the transcript is
18
                                     a true record of my
        stenographic notes.
19
                 I FURTHER CERTIFY that I am not a
        relative, employee, attorney, or counsel of
20
        of the parties, nor am I a relative or employee of
        any of the parties' attorney or counsel connected
        with the action, nor am I financially interested
21
        in the action.
22
                 Dated this 23rd day of June, 2016.
23
24
                         KELLI ANN WILLIS, RPR, CRR
25
```



Case 18-2868, Document 283, 08/	09/2019 2628241 Page	146 of 883
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EXI	IIDIT 0	
EXE	IIBIT 8	
(Filed)	Under Seal)	
	,	

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

CASE NO.:15-CV-07433-RWS

GHISLAINE MAXWELL,

Defendants.

January 25, 2017
9:05 a.m. - 12:44 p.m.
401 E. Las Olas Boulevard
Fort Lauderdale, Florida

**** C O N F I D E N T I A L ****

VIDEOTAPE DEPOSITION OF SARAH KELLEN

Taken on behalf of the before
Michael J. D'Amato, RMR, Notary Public in and for the
State of Florida at Large, pursuant to Notice of Taking
Deposition in the above cause.

Job # 293966



- 1 decline to answer.
- Q. Who introduced you to Ghislaine Maxwell?
- A. On advice of my counsel I must invoke my Fifth
- 4 and Sixth Amendment privilege which I understand
- 5 protect the innocent and therefore I must unfortunately
- 6 decline to answer.
- 7 Q. When you met Ghislaine Maxwell was she working
- 8 for Jeffrey Epstein?
- 9 A. On advice of my counsel I must invoke my Fifth
- 10 and Sixth Amendment privilege which I understand
- 11 protect the innocent and therefore I must unfortunately
- 12 decline to answer.
- 0. Did Ghislaine Maxwell work as a recruiter for
- 14 young girls for Jeffrey Epstein when you met her?
- 15 A. On advice of my counsel I must invoke my Fifth
- 16 and Sixth Amendment privilege which I understand
- 17 protect the innocent and therefore I must unfortunately
- 18 decline to answer.
- 19 Q. I'm defining young girls to mean females the
- 20 ages 12 to 23. Do you understand that?
- 21 A. On advice of my counsel I must invoke my Fifth
- 22 and Sixth Amendment privilege which I understand
- 23 protect the innocent and therefore I must unfortunately
- 24 decline to answer.
- Q. Didn't Ghislaine Maxwell approach you to



- 1 girls for sex with Jeffrey Epstein?
- 2 A. On advice of my counsel I must invoke my Fifth
- 3 and Sixth Amendment privilege which I understand
- 4 protect the innocent and therefore I must unfortunately
- 5 decline to answer.
- 6 Q. Did you assist Ghislaine Maxwell in procuring
- 7 underage girls for sex with Jeffrey Epstein?
- 8 A. On advice of my counsel I must invoke my Fifth
- 9 and Sixth Amendment privilege which I understand
- 10 protect the innocent and therefore I must unfortunately
- 11 decline to answer.
- 12 Q. Isn't it true that Ghislaine Maxwell would
- 13 recruit underage girls for sex and sex acts with
- 14 Jeffrey Epstein?
- 15 A. On advice of my counsel I must invoke my Fifth
- 16 and Sixth Amendment privilege which I understand
- 17 protect the innocent and therefore I must unfortunately
- 18 decline to answer.
- 19 Q. Did Ghislaine Maxwell give you information on
- 20 what underage girls she had contact information for?
- 21 A. On advice of my counsel I must invoke my Fifth
- 22 and Sixth Amendment privilege which I understand
- 23 protect the innocent and therefore I must unfortunately
- 24 decline to answer.
- 25 O. Did Ghislaine Maxwell teach you to offer these



	Page 199
1	CERTIFICATE OF COURT REPORTER
2	I, MICHAEL J. D'AMATO, a Registered Merit Reporter
3	and Notary Public in and for the State of Florida at
4	Large, do HEREBY CERTIFY that I was authorized to and
5	did stenographically report the deposition of SARAH
6	KELLEN; that a review of the transcript was requested;
7	and that the foregoing transcript, pages from 1 to 197,
8	is a true and accurate record of my stenographic notes.
9	I FURTHER CERTIFY that I am not a relative,
10	employee, attorney, or counsel of any of the parties, nor
11	am I a relative or employee of any of the parties'
12	attorney or counsel connected with the action, nor am I
13	financially interested in the action.
14	Dated this 27th day of January 2017.
15	
16	MICHAEL J. D'AMATO,
17	Registered Merit Reporter
18	
19	
20	
21	
22	
23	
24	
25	



Case	18-2868, Docum	ent 283, 08/09/20)19, 2628241, Pa	ge151 of 883	
Case	18-2868, Docum	ent 283, 08/09/20	019, 2628241, Pa	ge151 of 883	
		EXHII (Filed Und			

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

VIDEOTAPE DEPOSITION OF: PETER KENT

November 29, 2016

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

PURSUANT TO SUBPOENA AND NOTICE, the videotape deposition of PETER KENT was taken on behalf of the Plaintiff at 150 East 10th Avenue, Denver, Colorado 80230, on November 29, 2016, at 9:00 a.m., before Sandra L. Bray, Registered Diplomate Reporter, Certified Realtime Reporter, and Notary Public within Colorado.

MAGNA LEGAL SERVICES (866) 624-6221



Page 25 MS. McCAWLEY: I'm just asking about his 1 retention, which I believe is discoverable under 2 Rule 26. 3 (BY MS. McCAWLEY) Do you recall whether 4 O. 5 you were retained to perform work for one expert or 6 two experts? 7 THE DEPONENT: Am I allowed to answer this? 8 9 MR. PAGLIUCA: Yes. 10 I actually don't recall. (BY MS. McCAWLEY) Do you know whether 11 Q. 12 you were provided with one report or two reports when you initially were retained? 13 I believe I was provided with both the 14 reports at the same time. 15 Let me turn to about halfway back. 16 Ο. So it's going to be -- there's markings on the bottom. 17 It says PK-005. 18 19 Α. Yes. 20 Ο. And it indicates an amount there, an invoice. Is this one of your invoices? 21 22 Α. Yes. 23 Q. It indicates an amount of \$17,875? 24 Α. Yes. 25 Is that the total amount you've been Ο.

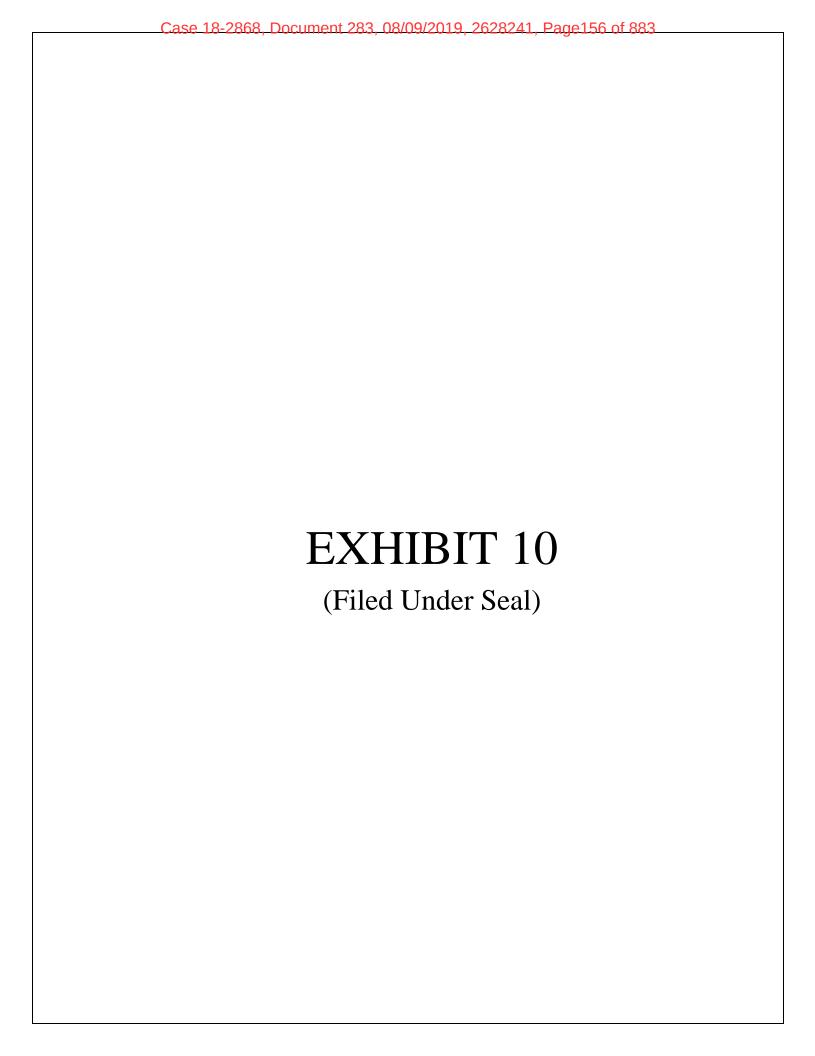


- 1 paid, with the exception of what we paid you for your
- 2 testimony here today, in this matter?
- A. I think so. What date was this?
- 4 Q. It looks like it's dated October 29th,
- 5 2016.
- 6 A. Oh, yes. In that case, yes.
- 7 Q. Have you performed any work after that
- 8 date that you've been paid for?
- 9 A. Only in preparation for this deposition.
- 10 Q. Have you been paid for that work?
- 11 A. No.
- 12 Q. No. Have you invoiced that work yet?
- 13 A. No.
- Q. All right. And then I'm going to turn
- 15 you to the next page -- please don't put it away
- 16 yet -- which appear to be invoices.
- 17 A. Time sheets.
- 18 O. Time sheets? You tell me.
- 19 A. It's a time sheet.
- Q. Is this typically how you record your
- 21 time when you're doing expert work?
- 22 A. Yes.
- Q. And this indicates -- the first entry is
- on 9/28/2016. Is that when you commenced work on this
- 25 matter?



	_
Page 162	2
REPORTER'S CERTIFICATE	
STATE OF COLORADO)	
) ss.	
CITY AND COUNTY OF DENVER)	
I, SANDRA L. BRAY, Registered Diplomate	
Reporter, Certified Realtime Reporter, and Notary	
Public ID 20084001729, State of Colorado, do hereby	
certify that previous to the commencement of the	
examination, the said PETER KENT was duly sworn by me	
to testify to the truth in relations to the matters in	
controversy between the parties hereto; that the said	
deposition was taken in machine shorthand by me at the	
time and place aforesaid and was thereafter reduced to	
typewritten form; that the foregoing is a true	
transcript of the questions asked, testimony given,	
and proceedings had.	
I further certify that I am not employed by,	
related to, nor of counsel for any of the parties	
herein nor otherwise interested in the outcome of this	
litigation.	
IN WITNESS WHEREOF, I have affixed my	
signature this 8th of December, 2016.	
My commission expires January 16, 2020.	
X Reading and Signing was requested.	
Reading and Signing was waived.	
Reading and Signing is not required.	





UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

- - - - - - - - x

VIRGINIA L. GIUFFRE,
Plaintiff,

Case No.: 15-cv-07433-RWS

-against-

GHISLAINE MAXWELL,

Defendant.

- - - - - - - - - - - - - - - - 2

CONFIDENTIAL

Videotaped oral deposition of NADIA MARCINKO, taken pursuant to notice, was held at the law offices of BOIES SCHILLER & FLEXNER, LLP, 575 Lexington Avenue, New York, New York commencing January 17, 2017, 1:04 p.m., before Leslie Fagin, a Court Reporter and Notary Public in the State of New York.

MAGNA LEGAL SERVICES
1200 Avenue of the Americas
New York, New York 10026
(866) 624-6221



Page 10 N. Marcinko - Confidential 1 reside, a dwelling that is paid for by either 2 Jeffrey Epstein or Ghislaine Maxwell? 3 4 Same answer. Α. 5 Do you know Jeffrey Epstein? Q. Α. Same answer. Do you know Ghislaine Maxwell? Q. 8 Α. Same answer. How old were you when you met 9 0. either Jeffrey Epstein or Ghislaine Maxwell? 10 Same answer. 11 Α. Who introduced to you Ghislaine 12 Ο. Maxwell? 13 14 Α. Same answer. When you met Ghislaine Maxwell, was 15 she working for Jeffrey Epstein? 16 17 Same answer. Α. Did Ghislaine Maxwell work as a 18 Ο. recruiter of young girls for Jeffrey Epstein 19 when you met her? 20 21 Α. Same answer. 22 Did Ghislaine Maxwell instruct you to recruit young girls for Jeffrey Epstein? 23 Same answer. 24 Α. 25 Did Ghislaine Maxwell encourage Ο.



- 1 N. Marcinko Confidential
- 2 Ghislaine Maxwell?
- 3 A. Same answer.
- 4 Q. Have you observed Ghislaine Maxwell
- 5 and Jeffrey Epstein offering these young
- 6 girls money, education or other things of
- 7 value during the massage to get that young
- 8 girl to return to Jeffrey Epstein for sexual
- 9 purposes?
- 10 A. Same answer.
- 11 Q. Have you observed Ghislaine Maxwell
- 12 and Jeffrey Epstein convert what started as a
- 13 massage with these young girls into something
- 14 sexual?
- 15 A. Same answer.
- 16 Q. Have you understood when I talk
- 17 about young girls, I'm talking about girls
- 18 between the age range of 13 and 23 years old?
- 19 A. Same answer.
- Q. Have you observed that when
- 21 Ghislaine Maxwell and Jeffrey Epstein used
- 22 the term, massage, it always includes sex?
- A. Same answer.
- Q. Was massage a word used by
- 25 Ghislaine Maxwell to lure girls into sex with



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Page 96
1
 2
                       CERTIFICATE
 3
               I HEREBY CERTIFY that the witness,
 4
    NADIA MARCINKO, was duly sworn by me and that
    the deposition is a true record of
                     by the witness.
5
    testimony given
6
                      Fagin,
               Registered Professional Reporter
 7
               Dated: January 17, 2017
 8
9
10
               (The foregoing certification of
    this transcript does not apply to any
11
12
    reproduction of the same by any means, unless
    under the direct control and/or supervision
13
    of the certifying reporter.)
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|---|--|
| Case 18-2868, Document 283, 08/09/2019, 2628241, Page161 of 883 | |
| EXHIBIT 11
(Filed Under Seal) | |
| | |

CONFIDENTIAL

Videotaped deposition of GHISLAINE MAXWELL, taken pursuant to subpoena, was held at the law offices of BOIES SCHILLER & FLEXNER, 575 Lexington Avenue, New York, New York, commencing April 22, 2016, 9:04 a.m., on the above date, before Leslie Fagin, a Court Reporter and Notary Public in the State of New York.

MAGNA LEGAL SERVICES
1200 Avenue of the Americas
New York, New York 10026



Page 23 G Maxwell - Confidential 1 I'm not talking about friends. 2 talking about individuals --3 MR. PAGLIUCA: I'm going to object 5 to you interrupting the witness who was answering your question. The question 7 was, have you ever seen anyone, female under the age of 18 at the house and 8 that's the question she was answering. 9 If you want to strike that question and 10 ask another question, feel free, but let 11 the witness respond, please. 12 MS. McCAWLEY: I will do that. 13 Have you ever observed a female 14 Q. under the age of 18 at Jeffrey Epstein's home 15 that was not a friend, a child -- one of your 16 17 friend's children? Again, I can't testify to that 18 19 because I have no idea what you are talking 20 about. You have no idea what I'm talking 21 about in the sense you never observed a 22 female under the age of 18 at Jeffrey 23 24 Epstein's home that was not one of your 25 friend's children, is that correct?



| | | Page 24 |
|----|---|---------|
| 1 | G Maxwell - Confidential | |
| 2 | MR. PAGLIUCA: Object to the form | |
| 3 | and foundation. | |
| 4 | A. How would I possibly know how | |
| 5 | someone is when they are at his house. You | |
| 6 | are asking me to do that. I cannot possibly | |
| 7 | testify to that. As far as I'm concerned, | |
| 8 | everyone who came to his house was an adult | |
| 9 | professional person. | |
| 10 | Q. Are you familiar with the police | |
| 11 | report that was issued in respect to the | |
| 12 | investigation in this matter? | |
| 13 | MR. PAGLIUCA: Object to the form | |
| 14 | and foundation. | |
| 15 | Q. Are you familiar with the police | |
| 16 | report that was used in this matter, the | |
| 17 | investigation of Jeffrey Epstein, has been | |
| 18 | produced as a document in this matter? | |
| 19 | A. I have seen a police report. | |
| 20 | (Maxwell Exhibit 1, police report, | |
| 21 | marked for identification.) | |
| 22 | Q. The police report that you have in | |
| 23 | front of you, can you turn to page 28 of that | |
| 24 | report, the numbers are on the top right-hand | |
| 25 | corner. | |



- 1 G Maxwell Confidential
- 2 -- just another one of Virginia's many
- 3 fictitious lies and stories to make this a
- 4 salacious event to get interest and press.
- 5 It's absolute rubbish.
- 6 Q. Were you in charge of hiring
- 7 individuals to provide massages for Jeffrey
- 8 Epstein?
- 9 A. My job included hiring many people.
- 10 There were six homes. As I sit here, I hired
- 11 assistants, I hired architects, I hired
- 12 decorators, I hired cooks, I hired cleaners,
- 13 I hired gardeners, I hired pool people, I
- 14 hired pilots, I hired all sorts of people.
- 15 In the course and a very small part
- of my job was from from time to time to find
- 17 adult professional massage therapists for
- 18 Jeffrey.
- 19 Q. When you say adult professional
- 20 massage therapists, where did you find these
- 21 massage therapists?
- 22 A. From time to time I would visit
- 23 professional spas, I would receive a massage
- 24 and if the massage was good I would ask that
- 25 man or woman if they did home visits.



Page 41 G Maxwell - Confidential 1 Did you hire her? 2 Q. A. First of all, I don't hire girls 3 like that, so let's be clear, I already 4 testified to that, and I have no idea what 5 you are referring to. 7 When you say girls like that, what Ο. do you mean? 8 9 I hire people who are professional 10 at the house. You are asking if I hired somebody to do what, I don't know what you 11 are talking about. I hired people to work in 12 the homes. 13 What was Nadia Marcinkova doing? 14 Q. MR. PAGLIUCA: Object to the form 15 and foundation. 16 I have no idea what Nadia 17 Α. Marcinkova was doing. I didn't hire her and 18 I don't know what you are referring to. 19 You met Nadia Marcinkova? 2.0 Ο. I testified I did. 21 Α. Did she work for Jeffrey Epstein? 22 Q. I have no idea what she did. 23 Α. Have you flown on planes with Nadia 24 Ο. 25 Marcinkova?



| | | Page 77 |
|----|---|---------|
| 1 | G Maxwell - Confidential | |
| 2 | MR. PAGLIUCA: Objection to the | |
| 3 | form and foundation. | |
| 4 | A. I don't know what that means, | |
| 5 | masseuse obligation, I don't know what you | |
| 6 | are referring to. Would you like to ask the | |
| 7 | question properly? | |
| 8 | Q. I think it was proper. I will ask | |
| 9 | it again. | |
| 10 | Did you ever assist in getting | |
| 11 | Virginia Roberts a cell phone to use during | |
| 12 | the time that she worked for Jeffrey Epstein? | |
| 13 | A. I have no recollection of doing | |
| 14 | anything of that nature. | |
| 15 | Q. Did you ever tell Virginia that you | |
| 16 | wanted her to have a cell phone so that she | |
| 17 | could be on call regularly? | |
| 18 | A. I have no recollection of that | |
| 19 | conversation. | |
| 20 | Q. How often would Virginia come over | |
| 21 | to the house in Palm Beach to give massages? | |
| 22 | MR. PAGLIUCA: Objection to the | |
| 23 | form and foundation. | |
| 24 | A. Ask the question again, please. | |
| 25 | O. How often did Virginia Roberts come | |



Page 78 G Maxwell - Confidential 1 over to the house in Palm Beach to give 2 3 massages? 4 It's important to understand that I Α. 5 wasn't with Jeffrey all the time. In fact, I was only in the house less than half the 7 time, so I cannot testify to when I wasn't in the house how often she came when I wasn't 8 9 there. 10 What I can say is that I barely would remember her, if not for all of this 11 rubbish, I probably wouldn't remember her at 12 all, except she did come from time to time 13 but I don't recollect her coming as often as 14 she portrayed herself. 15 How many times a day on an average 16 Ο. day would Jeffrey Epstein get a massage? 17 MR. PAGLIUCA: Objection to the 18 19 form and foundation. When I was at the house and when I 20 was there with him, he received a massage, on 21 average, about once a day. 22 Just once? 23 Q. 24 Α. Yes. 25 Were there days when he received Ο.



| | | Page | 79 |
|----|--|------|----|
| 1 | G Maxwell - Confidential | | |
| 2 | four or five? | | |
| 3 | MR. PAGLIUCA: Objection to the | | |
| 4 | form and foundation. | | |
| 5 | A. When I was present at the house, I | | |
| 6 | never saw something like that. | | |
| 7 | Q. Do you know if Virginia was | | |
| 8 | required to be on call at all times to come | | |
| 9 | to the house if Jeffrey wanted her there? | | |
| 10 | MR. PAGLIUCA: Objection to the | | |
| 11 | form and foundation. | | |
| 12 | A. I have no idea of the arrangements | | |
| 13 | that Virginia made with Jeffrey. | | |
| 14 | Q. When Virginia was in New York, | | |
| 15 | would Virginia sleep at Jeffrey's mansion in | | |
| 16 | New York? | | |
| 17 | MR. PAGLIUCA: Objection to the | | |
| 18 | form and foundation. | | |
| 19 | A. I don't recollect her being in New | | |
| 20 | York and I have no idea where she slept. | | |
| 21 | Q. You don't ever remember seeing | | |
| 22 | Virginia Roberts in New York? | | |
| 23 | MR. PAGLIUCA: Objection to the | | |
| 24 | form and foundation. | | |
| 25 | A. I would barely recollect her at | | |



- 1 G Maxwell Confidential
- 2 him at any of those homes?
- 3 A. Again, Virginia is absolutely
- 4 totally lying. This is a subject of
- 5 defamation about Virginia and the lies she
- 6 has told and one of lies she told was that
- 7 President Clinton was on the island where I
- 8 was present. Absolutely 1000 percent that is
- 9 a flat out total fabrication and lie.
- 10 Q. You did fly on planes, Jeffrey
- 11 Epstein's planes with President Clinton, is
- 12 that correct?
- 13 A. I have flown, yes.
- Q. Would it be fair to say that
- 15 President Clinton and Jeffrey are friends?
- 16 A. I wouldn't be able to characterize
- 17 it like that, no.
- 18 Q. Are they acquaintances?
- 19 A. I wouldn't categorize it.
- Q. He just allowed him to use his
- 21 plane?
- 22 A. I couldn't categorize Jeffrey's
- 23 relationship.
- Q. When you were on the plane with
- 25 Jeffrey and President Clinton, did you



- 1 G Maxwell Confidential
- 2 building that you would have seen when you
- 3 were on the trip in Europe?
- 4 MR. PAGLIUCA: Objection to the
- form and foundation.
- 6 A. I can't possibly answer that.
- 7 Q. Do you recall Virginia ever taking
- 8 pictures?
- 9 A. I barely recall Virginia, period.
- 10 Q. Do you recall her ever taking
- 11 pictures?
- 12 A. No, I don't.
- 13 Q. I'm going to direct your attention,
- 14 still within the flight logs to -- starting
- on the next page from where you just were
- 16 which is going to be 000747. And the date at
- 17 the top says 2001, you will see March and I'm
- 18 directing your attention down towards the
- 19 middle to the bottom where you will see the
- 20 numbers 27, 29 and 31.
- 21 A. Uh-huh.
- Q. And we've got actually I'm going to
- 23 direct your attention to the one that starts
- 24 with TEB for Teterboro to SAF for Santa Fe
- 25 and the one below it Santa Fe to Palm Beach



- 1 G Maxwell Confidential
- 2 her but you would have to ask Jeffrey what he
- 3 brought her on the trip for.
- 4 O. But she would travel with him when
- 5 there was a work trip like this?
- 6 A. I can't -- I'm seeing that she is
- 7 on this flight but I have no idea what she is
- 8 doing, he invited her, it would not be my
- 9 job.
- 10 Q. What about Nadia Bjorlin, would she
- 11 regularly travel with Jeffrey on flights?
- 12 A. I have no idea, you would have to
- 13 look through the flight logs. I have no
- 14 idea.
- 15 O. Your recollection is -- what is
- 16 your recollection, do you recollect Nadia
- 17 traveling often on flights with Jeffrey?
- 18 A. Absolutely not. No, not at all. I
- 19 don't recollect her actually on the flight at
- 20 all.
- 21 Q. I think you can set that aside for
- 22 the moment.
- 23 (Maxwell Exhibit 9, message pad
- pages, marked for identification.)
- O. We will mark as Exhibit 9 these



- 1 G Maxwell Confidential
- 2 excerpts from -- we will identify what they
- are but from the message pads.
- 4 Did you want to correct anything?
- 5 A. I want to make an addendum.
- 6 Would you mind rereading the last
- 7 question back to me?
- 8 (Record read.)
- 9 A. I also just want to say that at
- 10 this point I cannot recollect flying to
- 11 parties. Jeffrey went for work so -- was
- 12 this in Santa Fe, this flight as well.
- 13 Q. The flight we were looking at, yes
- 14 but it was to Santa Fe --
- 15 A. I don't recall going to any parties
- 16 in Santa Fe at any time but certainly flying
- 17 to Santa Fe for a party seems highly
- 18 improbable.
- 19 Q. So I'm going to direct your
- 20 attention to the document that I set before
- 21 you which is Bates number SAO 01456 and it
- 22 has different Bates numbers because it's a
- 23 smaller version of the larger production.
- 24 These are the pages I will be asking about.
- In the time that you were working



- 1 G Maxwell Confidential
- 2 with Jeffrey in Palm Beach, do you recall a
- 3 process for taking, anybody at the house
- 4 taking messages when incoming phone calls
- 5 came in?
- 6 A. You are supposed to take a message
- 7 and receive the message and write the message
- 8 down. Who was the message was for, what time
- 9 it was taken and who took it and what the
- 10 message was, obviously.
- 11 Q. Does what's in front of you look
- 12 familiar with respect to the message pads
- 13 that you would have used at the house?
- 14 A. It is familiar.
- 15 Q. I'm going to direct your attention
- 16 to the second page of it?
- 17 MR. PAGLIUCA: These all have SAO
- 18 numbers on them or Bates ranges and I
- don't see any of your Bates ranges on
- these. I know you have produced message
- 21 pads but those have your Bates range
- 22 numbers on them and I'm wondering if
- these are different documents.
- MS. McCAWLEY: It's the same, just
- ours have the Bates underneath them.



- 1 G Maxwell Confidential
- 2 believe. Do you believe --
- 3 A. I can only testify --
- 4 Q. Let me finish the question so the
- 5 record is clear.
- 6 Do you believe Jeffrey Epstein
- 7 sexually abused minors?
- 8 MR. PAGLIUCA: Objection to the
- 9 form and foundation.
- 10 Q. You can answer.
- 11 A. I can only testify to what I know.
- 12 I know that Virginia is a liar and I know
- 13 what she testified is a lie. So I can only
- 14 testify to what I know to be a falsehood and
- 15 half those falsehoods are enormous and so I
- 16 can only categorically deny everything she
- 17 has said and that is the only thing I can
- 18 talk about because I have no knowledge of
- 19 anything else.
- 20 Q. I'm not asking about Virginia. I'm
- 21 asking whether you believe that Jeffrey
- 22 Epstein sexually abused minors?
- 23 A. Again, I repeat, I can only go on
- 24 what I know and what I know is a falsehood
- 25 based on what Virginia said.



Page 178 G Maxwell - Confidential 1 What I'm asking you is whether you 2 3 believe Jeffrey Epstein abused minors? 4 MR. PAGLIUCA: I object to the form 5 and you made your record, she answered the question. A fair reading of her 7 answer is she doesn't have a belief because she doesn't have any personal 8 knowledge. 9 10 MS. McCAWLEY: Now you are testifying for the witness. Let her 11 answer the question. 12 MR. PAGLIUCA: It's a fair answer 13 to the question. 14 Again, I testified my only personal 15 Α. knowledge concerns Virginia and everything 16 17 Virginia has said is an absolute lie, which is why we are here in this room. 18 If you are 19 asking me to testify about things I have no knowledge of other than the police report 20 that you showed me, I am not in a position to 21 22 make a statement based on that because you are asking me to speculate and I cannot 23 24 speculate. 25 I'm asking you about your belief. Ο.



- 1 G Maxwell Confidential
- 2 I'm not asking you to speculate at all. I'm
- 3 asking what you believe.
- 4 A. You are asking me to speculate and
- 5 I won't speculate.
- 6 Q. I'm not asking you to speculate.
- 7 I'm asking what you believe.
- 8 MR. PAGLIUCA: She answered the
- 9 question and we can move on.
- MS. McCAWLEY: She hasn't answered
- 11 the question.
- MR. PAGLIUCA: We are not going to
- engage in this debate. She answered the
- 14 question. If you want to mark it and
- move to compel an answer to the
- 16 question, have at it. Okay.
- 17 Q. Ms. Maxwell, is it your belief that
- 18 Jeffrey Epstein interacted sexually with
- 19 minors?
- 20 A. Again, you are asking me the same
- 21 type of question exactly but with different
- 22 language. Again, my only knowledge of
- 23 somebody who claims these things that I have
- 24 personal knowledge of is Virginia. Virginia
- 25 is an absolute liar and everything she has



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| 1 | G Maxwell - Confidential | | |
| 2 | said is a lie. Therefore, based on those | | |
| 3 | lies I cannot speculate on what anybody else | | |
| 4 | did or didn't do because if Virginia is the | | |
| 5 | example of what that story is and everything | | |
| 6 | she said is false, so everything that leads | | |
| 7 | from that is false. | | |
| 8 | Q. So the 30 other minor children in | | |
| 9 | the police report are also telling lies about | | |
| 10 | being sexually abused during massages with | | |
| 11 | Mr. Epstein? | | |
| 12 | MR. PAGLIUCA: Objection to the | | |
| 13 | form and foundation. Counsel, can you | | |
| 14 | show me in these police reports who the | | |
| 15 | 30 minors are? | | |
| 16 | MS. McCAWLEY: I'm asking my | | |
| 17 | question. | | |
| 18 | MR. PAGLIUCA: You are making a | | |
| 19 | representation about numbers, you are | | |
| 20 | making a representation on the record | | |
| 21 | about what people said or didn't say. | | |
| 22 | We have no knowledge about that. These | | |
| 23 | are all redacted records so these are | | |
| 24 | bad questions. They don't lead to any | | |
| 25 | admissible evidence. It is only being | | |



- 1 G Maxwell Confidential
- 2 A. I'm carrying on.
- 3 Q. I'm sorry. I thought you were
- 4 done.
- 5 A. Please. Her statement also that
- 6 she was driven by her father to Palm Beach.
- 7 She was driven by her mother, as a matter of
- 8 fact. Her whole entire characterization of
- 9 the first meeting with Jeffrey, as I was
- 10 outside speaking to her mother.
- 11 Q. Let me stop you there, so we don't
- 12 get too far ahead. Let me make sure I
- 13 understand your testimony.
- 14 The first, in the first piece when
- 15 you were talking, I believe you said and
- 16 correct me if I'm wrong, that her
- 17 characterization of the first meeting at
- 18 Mar-a-Lago was an obvious lie.
- 19 What part of that meeting was an
- 20 obvious lie?
- 21 A. By her own testimony, all her
- 22 various many different descriptions of what
- she was or wasn't or where she was or wasn't,
- 24 they have all changed. She was either front
- 25 of house or bathroom attendant. I don't know



- 1 G Maxwell Confidential
- 2 what she was, so just by her own words, one
- 3 doesn't know what's true and what isn't true.
- 4 Q. Are you saying what position she
- 5 said she was working in, is that what you are
- 6 considering the obvious lie?
- 7 A. I said inconsistency within her own
- 8 statement from everything, so in the
- 9 beginning it starts off with different
- 10 statements.
- 11 Q. Then I believe you said the second
- 12 piece was that she was driven by her father?
- 13 A. I said she was driven by her
- 14 mother.
- 15 O. That's the obvious lie?
- 16 A. It's an obvious lie to me.
- 17 O. You said why don't you state it in
- 18 your own words but the characterization of
- 19 how she was with Jeffrey, what about that is
- 20 an obvious lie?
- 21 A. I was standing outside talking to
- 22 her mother so the entire story is a
- 23 fabrication.
- Q. Did she not have sex with Jeffrey
- 25 Epstein during that first massage?



- 1 G Maxwell Confidential
- 2 up to the room and start a massage?
- 3 A. He would not.
- 4 Q. So the young girls in the police
- 5 report who say they came over and were led up
- 6 to the room on the first day, would they be
- 7 wrong about that?
- 8 MR. PAGLIUCA: Objection to form
- 9 and foundation.
- 10 A. I can't comment what happened when
- I was not at the house. I can only comment
- 12 when I was at the house.
- 0. Was there ever a time where a woman
- 14 came to the house for the first time to give
- 15 a massage and Jeffrey had the massage that
- 16 day?
- 17 MR. PAGLIUCA: Objection to the
- 18 form and foundation.
- 19 A. Can we talk about adult
- 20 professional masseuses, please?
- 21 Q. I'm asking, whether adult or
- 22 underage?
- 23 A. I'm not interested in talking about
- 24 underage. I can only testify to what I know,
- 25 professional masseuses, adult, I cannot



- 1 G Maxwell Confidential
- 2 testify to anything else.
- Q. Why can't you testify to an
- 4 underage girl that came over and was led up
- 5 to the room for a massage?
- 6 MR. PAGLIUCA: Objection to the
- 7 form and foundation.
- 8 A. The police records you are
- 9 referring to?
- 10 Q. You are saying that didn't happen.
- 11 You're saying I can only testify to adults
- 12 that came for an interview and were led up to
- 13 the room. Why can't you testify to whether
- 14 an underage girl was brought in for an
- 15 interview and led up --
- 16 MR. PAGLIUCA: Objection to the
- 17 form and foundation.
- 18 O. Go ahead.
- 19 A. Can you reask the question.
- Q. Why can't you testify as to an
- 21 underage girl who came over for an interview
- 22 and then was then led up to the room for the
- 23 massage?
- A. You've mangled your entire
- 25 question. Can you please reask that in a way



- 1 G Maxwell Confidential
- 2 present at the home when a girl under the age
- 3 of 18 came over for the purposes of giving a
- 4 massage?
- 5 MR. PAGLIUCA: Objection to the
- form and foundation.
- 7 Q. You can answer.
- 8 A. You can be a professional masseuse
- 9 at 17 in Florida, so as far as I am aware, a
- 10 professional masseuse showed up for a
- 11 massage. There is nothing inappropriate or
- 12 incorrect about that and your
- 13 mischaracterization of it, I think is
- 14 unfortunate.
- 15 O. How many teenagers did he have that
- 16 were professional masseuses that worked in
- 17 his home?
- 18 MR. PAGLIUCA: Objection to the
- 19 form and foundation.
- Q. How many?
- 21 A. First of all, I am not aware of
- 22 teenagers who worked in his home.
- 23 Q. You are aware of Virginia Roberts
- 24 and you've stated she was 17 and she worked
- 25 for him, correct?



- 1 G Maxwell Confidential
- 2 A. No. I did not state that at all,
- 3 you are mischaracterizing my words and what I
- 4 said.
- 5 What I said was that we can all
- 6 agree and I think at this point there is not
- 7 one person in this room, however much you
- 8 would like her to be younger, to say she was
- 9 not 17 because that has been a very offensive
- 10 thing that you have all done. So she was 17.
- 11 At 17 you are allowed to be a professional
- 12 masseuse and as far as I'm concerned, she was
- 13 a professional masseuse. There is nothing
- 14 inappropriate or incorrect about her coming
- 15 at that time to give a massage. Her entire
- 16 characterization of her first time at the
- 17 house was to me an obvious lie, given it was
- 18 impossible for her entire story to take place
- 19 given I was speaking to her mother the entire
- 20 she was at the house.
- Q. So it was impossible that day, that
- 22 first day she came and you were speaking to
- 23 the mother, for Virginia Roberts to have had
- 24 sex with Jeffrey Epstein during the time that
- 25 you were outside with her mother?



- 1 G Maxwell Confidential
- 2 absolutely 1000 percent that she did not have
- 3 any type of sexual relations as described by
- 4 you in your court papers that took place
- 5 because those allegedly according to her lies
- 6 involved some aspect of me.
- 7 As I was standing outside with her
- 8 mother the entire time, her entire story is a
- 9 lie. Therefore, to ask me what she did or
- 10 didn't do during that time, I can only
- 11 testify to what she said about me, which was
- 12 1000 percent false.
- 13 Q. So let's not take the first time,
- 14 let's take the next time she comes.
- 15 A. No no, how can do you that, when
- 16 the basis of this entire horrible story that
- 17 you have put out is based on this first
- 18 appalling story that was written, repeated,
- 19 multiply by the press that lied about her
- 20 age, lied about the first time she came, lied
- 21 about and characterized the entire first
- 22 time. I have been so absolutely appalled by
- 23 her story and appalled by the entire
- 24 characterization of it and I apologize
- 25 sincerely for my banging at the table



- 1 G Maxwell Confidential
- 2 earlier, I hope you accept my apology. It's
- 3 borne out of years of feeling the pressure of
- 4 this entire lie that she has perpetrated from
- 5 our first time and whilst I recognize that
- 6 was -- I hope you forgive me sincerely
- 7 because it was just the length of time that
- 8 that terrible story has been told and retold
- 9 and rehashed when I know it to be 100 percent
- 10 false.
- 11 Q. So not the first time she came, but
- 12 the second time she came or the third time or
- 13 any time she came, did you ever participate
- in a massage with her in Jeffrey Epstein's
- 15 room?
- 16 A. I have never participated at any
- 17 time with Virginia in a massage with Jeffrey.
- 18 Q. Have you ever participated at any
- 19 time with Virginia in any kind of sexual
- 20 contact or sexual touching with Jeffrey and
- 21 Virginia?
- 22 A. I have not.
- 23 Q. So we were going through the list
- 24 of obvious lies and you were talking about
- 25 the first time which I believe we have



- 1 G Maxwell Confidential
- 2 of 18?
- A. I think we can establish what adult
- 4 would be.
- 5 Q. You never interviewed or I know you
- 6 don't want to use the word hired, whatever
- 7 your role was, you brought in an exercise
- 8 instructor that was under the age of 18 to
- 9 work at the house?
- 10 MR. PAGLIUCA: Object to the form
- 11 and foundation.
- 12 A. I have already testified that what
- 13 I was responsible for was to find people who
- 14 had competencies in whatever area I was
- 15 looking for. The competencies I was looking
- 16 for were professional and adult.
- 17 O. So there was no exercise instructor
- 18 that worked at the Palm Beach house or the
- 19 New York house or the New Mexico house or the
- 20 USVI under the age of 18?
- 21 MR. PAGLIUCA: Objection to the
- form and foundation.
- 23 A. I can only testify to when I was at
- 24 the house.
- 25 O. Yes.



Page 310 G Maxwell - Confidential 1 MR. PAGLIUCA: Objection to the 2 form and foundation. 3 That's not how I would characterize Α. 4 5 that. How would you characterize it? O. 7 Α. I have testified that I'm responsible for finding professional people 8 9 to work in the homes, age appropriate adult 10 people, so from pool attendants, to 11 gardeners, to chefs, to housekeepers, to 12 butlers, to chauffeurs and one of the functions was to be able to answer the 13 telephones and in the context of finding 14 someone to answer the telephones, I did look 15 to try to find appropriate people to answer 16 17 the phones. Ο. So did you find Johanna for 18 19 purposes of that role? So in the course of looking for 20 somebody to answer phones at the house, 21 Johanna was one of the people who said that 22 she was willing to answer phones. 23 24 Ο. Did you approach her at her school 25 campus?



- 1 G Maxwell Confidential
- Q. List all of the girls you met and
- 3 brought to Jeffrey Epstein's home for the
- 4 purposes of employment that were under the
- 5 age of 18?
- 6 MR. PAGLIUCA: Objection to the
- 7 form and foundation.
- 8 A. I've already characterized my job
- 9 was to find people, adults, professional
- 10 people to do the jobs I listed before; pool
- 11 person, secretary, house person, chef, pilot,
- 12 architect.
- 13 Q. I'm asking about individuals under
- 14 the age of 18, not adult persons, people
- 15 under the age of 18.
- 16 A. I looked for people or tried to
- 17 find people to fill professional jobs in
- 18 professional situations.
- 19 Q. So Virginia Roberts was under the
- 20 age of 18, correct?
- 21 A. I think we've established that
- 22 Virginia was 17.
- 23 Q. Is she the -- sorry, go ahead.
- Is she the only individual that you
- 25 met for purposes of hiring someone for



Page 390 G Maxwell - Confidential 1 MR. PAGLIUCA: Object to the form 2 and foundation. 3 4 Α. If you want to ask Jeffrey 5 questions about me, you would have to ask him. 6 7 Have you ever been involved in any Ο. illegal activity in your lifetime? 8 MR. PAGLIUCA: Objection to the 9 10 form and foundation. I can't think of anything I have 11 12 done that is illegal. Have you ever been arrested? 13 Q. I have a DUI in the U.K. a long 14 Α. 15 time ago. Is that the only arrest you have on 16 Q. 17 your record? 18 Α. Yes. 19 I will mark as Maxwell 22 this 2.0 email? 21 (Maxwell Exhibit 22, email, marked for identification.) 22 This is dated January 21, 2015. 23 Q. It's from Jeffrey Epstein to you, forwarding 24 25 the Guardian and I would like you to look at



| | Page 416 |
|----|---|
| 1 | |
| 2 | CERTIFICATE |
| 3 | |
| 4 | |
| 5 | I HEREBY CERTIFY that the witness, |
| 6 | GHISLAINE MAXWELL, was duly sworn by me and |
| 7 | that the deposition is a true record of the |
| 8 | testimony given by the witness. |
| 9 | |
| 10 | Testier tage |
| 11 | Leslie Fagin, |
| | Registered Professional Reporter |
| 12 | Dated: April 22, 2016 |
| 13 | |
| 14 | |
| 15 | (The foregoing certification of |
| 16 | this transcript does not apply to any |
| 17 | reproduction of the same by any means, unless |
| 18 | under the direct control and/or supervision |
| 19 | of the certifying reporter.) |
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| | | ATES DISTRICT COURT
DISTRICT OF NEW YORK | |
| | VIRGINIA I | G. GIUFFRE, | x |
| | | Plaintiff, | |
| | -agair | nst- | Case No.:
15-cv-07433-RWS |
| | GHISLAINE | MAXWELL, | |
| | | Defendant. | |
| | | | x |
| | | **CONFIDENTIA | /L * * |

Continued Videotaped Deposition of GHISLAINE MAXWELL, the Defendant herein, taken pursuant to subpoena, was held at the law offices of Boies, Schiller & Flexner, LLP, 575 Lexington Avenue, New York, New York, commencing July 22, 2016, 9:04 a.m., on the above date, before Leslie Fagin, a Court Reporter and Notary Public in the State of New York.

MAGNA LEGAL SERVICES
1200 Avenue of the Americas
New York, New York 10026
(866) 624-6221

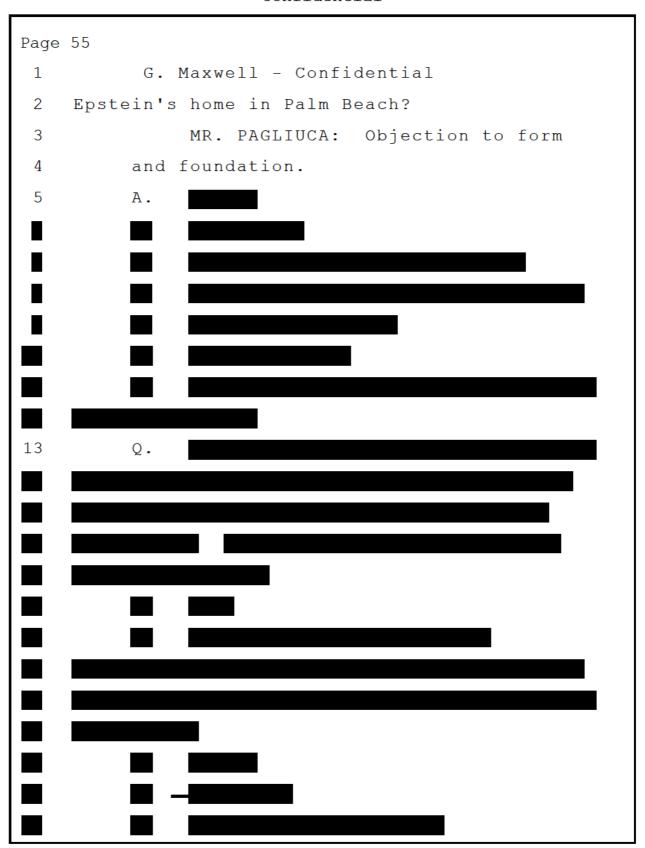


Page 44 G. Maxwell - Confidential thought. I really don't recall her, so it's hard for me to testify what I thought about 3 her age at the time. Q. Was Virginia, in the period of 5 around 2000, the youngest person that, as you 6 7 understood it, was giving Mr. Epstein 8 massages? 9 MR. PAGLIUCA: Object to the form 10 and foundation. 11 Α. Again, I can't testify to her age, 12 but everybody else that I can recall seemed 13 to be again, like I would say, adults. 14 Q. You didn't think Virginia was an adult, did you? 15 MR. PAGLIUCA: Object to the form 16 17 and foundation. Like I said, I don't recall her. 18 Α. don't recall thinking about -- my memory is 19 of adults giving Jeffrey massages, and as I 20 don't really remember Virginia around that 21 22 time, I don't know what I think. 23 You do remember Virginia, about that time back in the 2000s, giving 24 25 Mr. Epstein massages?

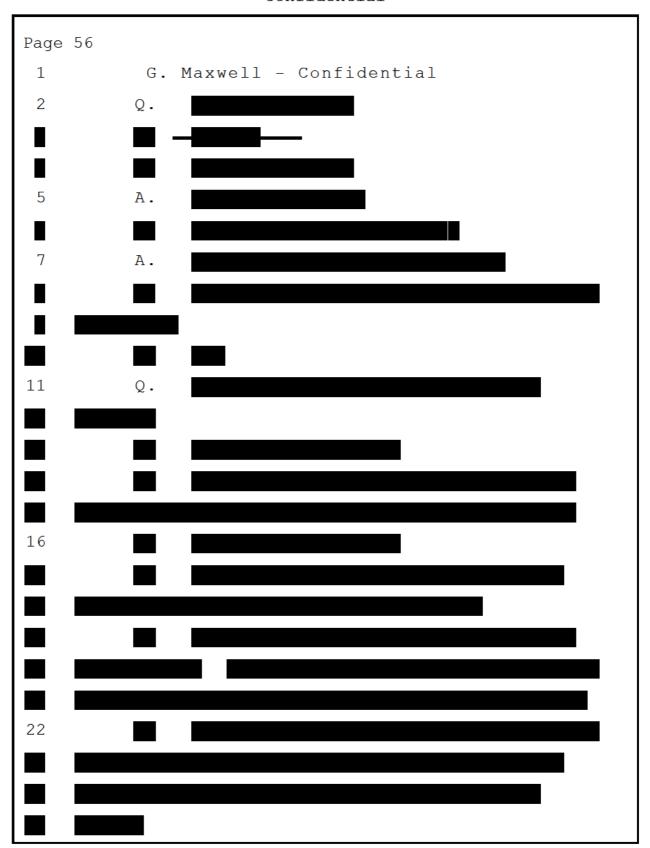


Page 45 G. Maxwell - Confidential 2 MR. PAGLIUCA: Object to the form and foundation. 3 I barely remember her at all. Whether you barely remember her or 5 not, you do remember that back in the period 6 around 2000, Virginia was giving Mr. Epstein 7 8 massages, right? 9 MR. PAGLIUCA: Objection to form 10 and foundation. Only in the most general terms. 11 Α. Ιt 12 would be somebody who would give him a massage, and that's it. 13 During the period of time back in 14 the period around 2000, when you knew that 15 Virginia was somebody who would give 16 Mr. Epstein a massage, was she somebody who 17 18 you considered an adult? MR. PAGLIUCA: Objection to form 19 and foundation. 20 21 I didn't consider her at all 22 because she is not somebody that I really 23 interacted with. 24 It is your testimony that Virginia 0. 25 was not somebody that you interacted with, is

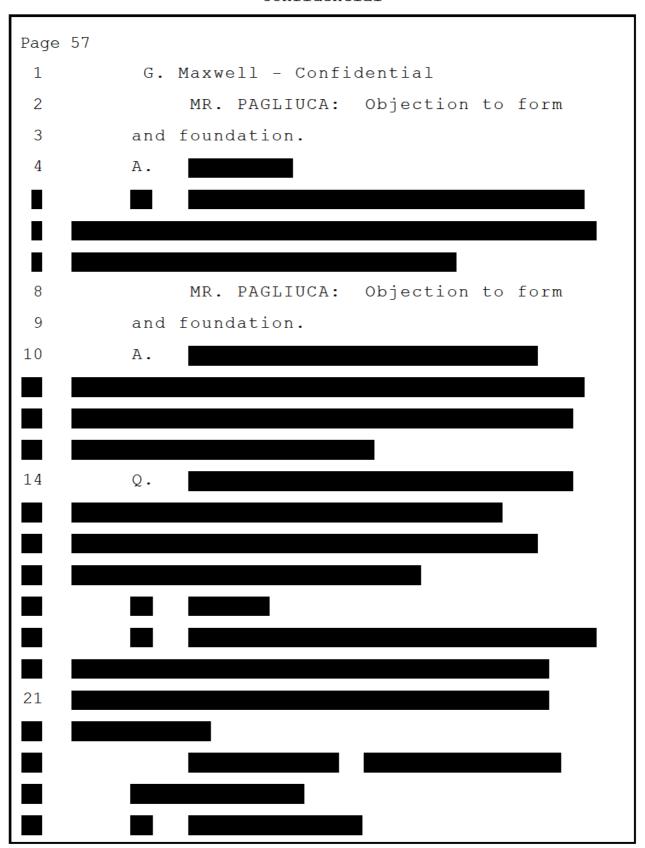




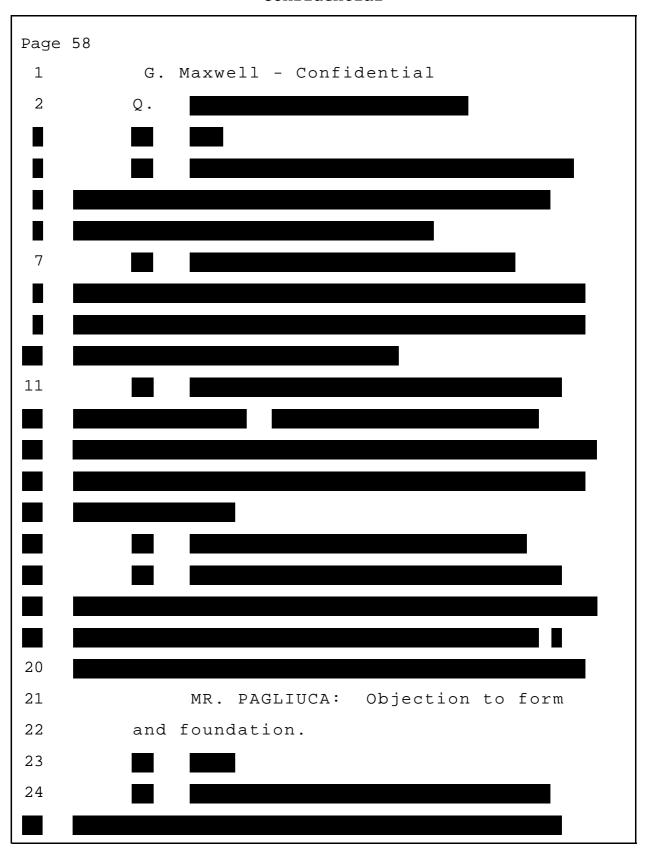








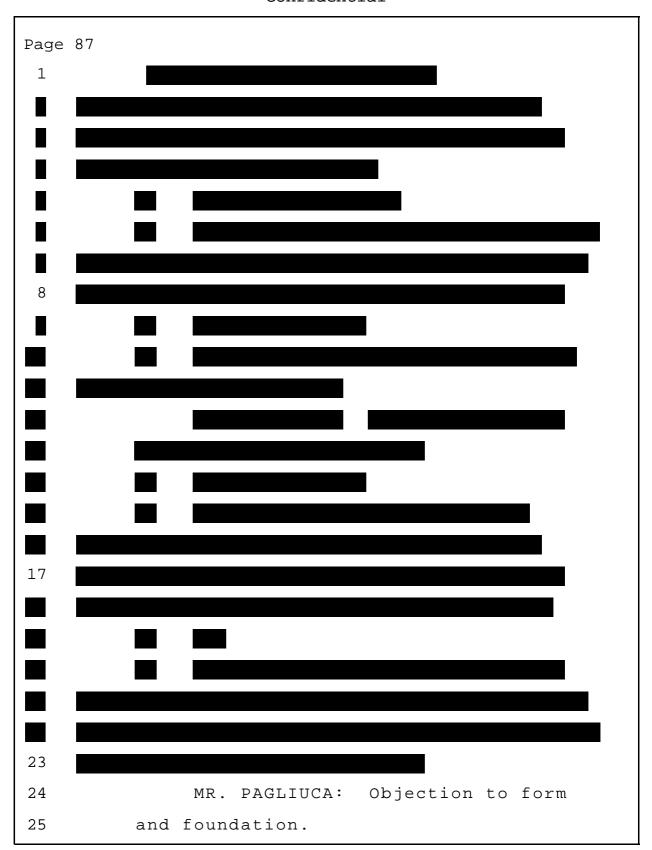






| Page | 86 |
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| 1 | G. Maxwell - Confidential |
| 2 | and foundation. |
| 3 | A. No. |
| 4 | Q. |
| | |
| | |
| | |
| 8 | MR. PAGLIUCA: Objection to form |
| 9 | and foundation. |
| 10 | A. I don't know. |
| 11 | |
| | |
| | |
| | |
| | |
| | |
| 17 | MR. PAGLIUCA: Objection to form |
| 18 | and foundation. Asked and answered. |
| 19 | A. No. |
| 20 | Q. Were they ever in the Virgin |
| 21 | Islands? |
| 22 | MR. PAGLIUCA: Objection to form |
| 23 | and foundation. |
| 24 | A. No. |
| 25 | |







| Page 91 | |
|---|---|
| 1 G. Maxwell - Confidential | |
| 2 it to something in the case. | |
| 3 MR. BOIES: I think it's tied, but | |
| 4 if you instruct her not to answer, it | |
| 5 goes into the | |
| 6 MR. PAGLIUCA: Meat grinder. | |
| 7 BY MR. BOIES: | |
| 8 Q. | 1 |
| | |
| | |
| | |
| | |
| | |
| 14 A. Can you repeat the question? | |
| 15 Q. | |
| | |
| | |
| | 1 |
| | |
| 20 MR. PAGLIUCA: Same objection. | |
| 21 A. No. | |
| 22 Q. | |
| | |
| 24 . | |
| | |



| Page | 197 |
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| 1 | |
| 2 | CERTIFICATE |
| 3 | |
| 4 | |
| 5 | I HEREBY CERTIFY that GHISLAINE |
| 6 | MAXWELL, was duly sworn by me and that the |
| 7 | deposition is a true record of the testimony |
| 8 | given by the witness. |
| 9 | |
| 10 | Tishing Fager |
| 11 | Leslie Fagin, |
| | Registered Professional Reporter |
| 12 | Dated: July 22, 2016 |
| 13 | |
| 14 | |
| 15 | (The foregoing certification of |
| 16 | this transcript does not apply to any |
| 17 | reproduction of the same by any means, unless |
| 18 | under the direct control and/or supervision |
| 19 | of the certifying reporter.) |
| 20 | |
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| 22 | |
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|---|--|
| Case 18-2868, Document 283, 08/09/2019, 2628241, Page203 of 883 | |
| EXHIBIT 12
(Filed Under Seal) | |
| | |

GIUFFRE

VS.

MAXWELL

Deposition

LYNN TRUDE MILLER

05/24/2016

Agren Blando Court Reporting & Video, Inc.

216 16th Street, Suite 600 Denver Colorado, 80202 303-296-0017

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

CONFIDENTIAL VIDEOTAPED DEPOSITION OF LYNN TRUDE MILLER May 24, 2016

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

APPEARANCES:

S.J. QUINNEY COLLEGE OF LAW, UNIVERSITY OF UTAH
By Paul G. Cassell, Esq.
383 S. University Street
Salt Lake City, UT 84112
Phone: 801.585.5202
Cassellp@law.utah.edu
Appearing on behalf of the
Plaintiff

HUTCHINSON BLACK AND COOK, LLC

By John Clune, Esq.

921 Walnut Street

Suite 200

Boulder, CO 80302

Phone: 303.442.6514

clune@hbcboulder.com

Appearing on behalf of the Deponent

| 1 | |
|----|---|
| 2 | APPEARANCES: (Continued) |
| 4 | HADDON, MORGAN AND FORMAN, P.C. |
| 3 | By Laura A. Menninger, Esq. |
| 4 | Jeffrey S. Pagliuca, Esq.
150 East 10th Avenue |
| | Denver, CO 80203 |
| 5 | Phone: 303.831.7364
lmenninger@hmflaw.com |
| 6 | jpagliuca@hmflaw.com |
| 7 | Appearing on behalf of the
Defendant |
| , | Defendant |
| 8 | Also Present: |
| 9 | Maryvonne Tompkins, Videographer |
| 10 | |
| 10 | |
| 11 | |
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- 1 Α Because I wasn't told any different. 2 Do you know where any -- any source of 0 3 that information came from? Was it Sky? 4 It came from Sky. Α 5 Okay. And what do you recall him telling 0 6 you about when Virginia stopped working at 7 Mar-a-Lago? 8 She was in a discussion with Mrs. Maxwell Α 9 to educate her and take her under her wing and be her 10 That's what I heard. new momma. 11 Okay. And who told you that? Q 12 Α Sky. 13 And do you remember when Sky told O Okay. 14 you that? 15 I don't remember. Α 16 0 Okay. Did you learn anything else about 17 that, other than what you just said? 18 Α No.
- 21 A I think she went with Mrs. Maxwell.

19

20

Q

after Mar-a-Lago?

- Q But do you know where, physically?
- 23 A Physically, Sky and I dropped her off one

Okay. Do you know where she went to work

- day at Mrs. Maxwell's. I did not speak with
- Mrs. Maxwell. I didn't have anything to say to her.

| 1 | STATE OF COLORADO) |
|----|--|
| 2 |) ss. REPORTER'S CERTIFICATE |
| 3 | COUNTY OF DENVER) |
| 4 | I, Kelly A. Mackereth, do hereby certify |
| 5 | that I am a Registered Professional Reporter and |
| 6 | Notary Public within the State of Colorado; that |
| 7 | previous to the commencement of the examination, the |
| 8 | deponent was duly sworn to testify to the truth. |
| 9 | I further certify that this deposition was |
| 10 | taken in shorthand by me at the time and place herein |
| 11 | set forth, that it was thereafter reduced to |
| 12 | typewritten form, and that the foregoing constitutes |
| 13 | a true and correct transcript. |
| 14 | I further certify that I am not related to, |
| 15 | employed by, nor of counsel for any of the parties or |
| 16 | attorneys herein, nor otherwise interested in the |
| 17 | result of the within action. |
| 18 | In witness whereof, I have affixed my |
| 19 | signature this 31st day of May, 2016. |
| 20 | My commission expires April 21, 2019. |
| 21 | |
| 22 | Kelly A. Mackereth, CRR, RPR, CSR |
| 23 | 216 - 16th Street, Suite 600
Denver, Colorado 80202 |
| 24 | Deliver, Cororado 60202 |
| 25 | |

| Case 18-2868, Document 283, 08/09/2019, 2628241, Page209 of 883 | |
|---|--|
| Case 18-2868, Document 283, 08/09/2019, 2628241, Page209 of 883 | |
| EXHIBIT 13
(Filed Under Seal) | |
| | |
| | |

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----x

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----x

June 21, 2016 9:17 a.m.

C O N F I D E N T I A L

Deposition of JOSEPH RECAREY, pursuant
to notice, taken by Plaintiff, at the
offices of Boies Schiller & Flexner, 401

Las Olas Boulevard, Fort Lauderdale, Florida,
before Kelli Ann Willis, a Registered

Professional Reporter, Certified Realtime
Reporter and Notary Public within and
for the State of Florida.



| | Page 25 |
|----|--|
| 1 | JOSEPH RECAREY - CONFIDENTIAL |
| 2 | BY MR. EDWARDS: |
| 3 | Q. All right. |
| 4 | Was SG a licensed massage therapist? |
| 5 | MR. PAGLIUCA: Object to form and |
| 6 | foundation. |
| 7 | THE WITNESS: No. |
| 8 | BY MR. EDWARDS: |
| 9 | Q. And at 14 years old, are you permitted to |
| 10 | be a licensed massage therapist? |
| 11 | A. Not to my knowledge. |
| 12 | Q. After speaking with SG and understanding |
| 13 | her account of what took place at Jeffrey Epstein's |
| 14 | home, what what happened next in the |
| 15 | investigation? |
| 16 | A. At some point the investigation was turned |
| 17 | over to me for follow-up. I know there was trash |
| 18 | pulled that was done prior to and surveillance |
| 19 | that was done prior to the case being turned over to |
| 20 | me; and trash pulls being an investigative technique |
| 21 | to acquire intelligence, information and evidence. |
| 22 | Q. Okay. If we go to page 17, at the top, |
| 23 | and, first of all, I will ask you from memory, do |
| 24 | you remember if identified Jeffrey |
| 25 | Epstein in a photo lineup? |



| | Page 27 |
|----|---|
| 1 | JOSEPH RECAREY - CONFIDENTIAL |
| 2 | "a cross-reference"? |
| 3 | A. Uh-huh. |
| 4 | Q. How is a cross-reference performed? What |
| 5 | does that mean? |
| 6 | A. When when something is |
| 7 | cross-referenced, they they jot down license |
| 8 | plate numbers. They conduct their background into |
| 9 | the individuals; photographs, computer research. |
| 10 | Q. A cross-reference of Jeffrey Epstein's |
| 11 | residence revealed which affiliated names? |
| 12 | A. It revealed Nadia Marcinkova, Ghislane |
| 13 | Maxwell, Mark Epstein. Also, the cross-reference, |
| 14 | any previous reports from the residence as well. |
| 15 | Q. During your investigation, did you learn |
| 16 | of any involvement that Nadia Marcinkova had with |
| 17 | any of the activities you were investigating? |
| 18 | MR. PAGLIUCA: Object to form and |
| 19 | foundation. |
| 20 | THE WITNESS: Yes. |
| 21 | BY MR. EDWARDS: |
| 22 | Q. And what involvement did you learn of |
| 23 | Nadia Marcinkova? |
| 24 | MR. PAGLIUCA: Object to form and |
| 25 | foundation. |



| | Page 28 |
|----|--|
| 1 | JOSEPH RECAREY - CONFIDENTIAL |
| 2 | THE WITNESS: Nadia was involved sexually |
| 3 | with one of the victims at Epstein's request. |
| 4 | BY MR. EDWARDS: |
| 5 | Q. Okay. Do you remember which victim you're |
| 6 | remembering right now? |
| 7 | A. AH. |
| 8 | Q. Okay. If it indicates in the report that |
| 9 | she was also sexually involved with other victims, |
| 10 | is that possible as well? |
| 11 | A. Yes. |
| 12 | MR. PAGLIUCA: Object to form and |
| 13 | foundation. |
| 14 | BY MR. EDWARDS: |
| 15 | Q. Okay. The one that you remember in your |
| 16 | mind is AH? |
| 17 | MR. PAGLIUCA: Object to form and |
| 18 | foundation. |
| 19 | THE WITNESS: Correct. |
| 20 | BY MR. EDWARDS: |
| 21 | Q. The other name that is on here as a |
| 22 | cross-reference is Ghislane Maxwell. |
| 23 | Did you speak with Ghislane Maxwell? |
| 24 | A. I did not. |
| 25 | Q. Did you ever attempt to speak with |



Page 29 1 JOSEPH RECAREY - CONFIDENTIAL 2 Ghislane Maxwell? 3 I wanted to speak with everyone related to 4 this home, including Ms. Maxwell. My contact was through Gus, Attorney Gus Fronstin, at the time, who 5 6 initially had told me that he would make everyone available for an interview. And subsequent 7 8 conversations later, no one was available for interview and everybody had an attorney, and I was not going to be able to speak with them. 10 11 Okay. During your investigation, what did Ο. you learn in terms of Ghislane Maxwell's 12 13 involvement, if any? MR. PAGLIUCA: Object to form and 14 foundation. 15 16 THE WITNESS: Ms. Maxwell, during her research, was found to be Epstein's long-time 17 friend. During the interviews, Ms. Maxwell was 18 involved in seeking girls to perform massages 19 20 and work at Epstein's home. 21 MR. PAGLIUCA: Object to form and 22 foundation. 23 BY MR. EDWARDS: 24 Did you interview -- how many girls did 25 you interview that were sought to give or that



Page 30 1 JOSEPH RECAREY - CONFIDENTIAL 2 actually gave massages at Epstein's home? MR. PAGLIUCA: Object to form and 3 4 foundation. BY MR. EDWARDS: 5 6 Q. Approximately. 7 MR. PAGLIUCA: Same objection. 8 THE WITNESS: I would say approximately 9 30; 30, 33. 10 BY MR. EDWARDS: And of the 30, 33 or so girls, how many 11 12 had massage experience? 13 MR. PAGLIUCA: Object to form and foundation. 14 THE WITNESS: I believe two of them may 15 16 have been -- two of them. 17 BY MR. EDWARDS: 18 Okay. And as we go through this report, 19 you may remember the names? 20 Α. Correct. Let me correct myself. 21 believe only one had. 22 And was that -- was that one of similar Q. 23 age to the other girls? 24 MR. PAGLIUCA: Object to form and 25 foundation.



Page 40 1 JOSEPH RECAREY - CONFIDENTIAL foundation. 2 3 THE WITNESS: Yes, I did. BY MR. EDWARDS: 4 5 And were trash pulls done at the property Ο. 6 of Jeffrey Epstein? 7 Α. Yes. 8 What is the purpose of a trash pull, and 9 what is a trash pull? 10 A trash pull is when property is discarded, such as trash, we coordinate with the 11 12 sanitation department to collect the trash, once it leaves the property, and it's put into an empty well 13 of the trash truck. We acquire the bags, and we 14 sift through the contents of the trash. 15 16 Did you or another detective from the unit observe each step of the trash pull to make sure 17 that you had a good chain of custody of the 18 evidence? 19 20 MR. PAGLIUCA: Object to form and 21 foundation. 22 THE WITNESS: Yes. The members of 23 the OCTAN unit at that time did. BY MR. EDWARDS: 24 25 Q. Okay. And what is that process?



| | Page 41 |
|----|---|
| 1 | JOSEPH RECAREY - CONFIDENTIAL |
| 2 | A. The process |
| 3 | MR. PAGLIUCA: Object to form and |
| 4 | foundation. |
| 5 | THE WITNESS: The process is when the |
| 6 | once you coordinate a trash pull with the |
| 7 | sanitation supervisor, you meet with the |
| 8 | sanitation worker and ensure that either the |
| 9 | can that he's going to place in the well is |
| 10 | completely empty and you physically observe him |
| 11 | collect the trash and place it into the empty |
| 12 | container. And then you follow him to a |
| 13 | disclosed area, and we retrieve the bags and |
| 14 | you sift through the trash. |
| 15 | BY MR. EDWARDS: |
| 16 | Q. Okay. What were you looking for in terms |
| 17 | of evidentiary value from these trash pulls? |
| 18 | MR. PAGLIUCA: Object to form and |
| 19 | foundation. |
| 20 | THE WITNESS: We were looking for any |
| 21 | any form of identification. You were looking |
| 22 | for to gather any kind of intelligence |
| 23 | and/or evidence. |
| 24 | BY MR. EDWARDS: |
| 25 | Q. Okay. If we go to page 20 of the report, |



| | Page 42 |
|----|--|
| 1 | JOSEPH RECAREY - CONFIDENTIAL |
| 2 | I guess I'll start with where it says on 4/4/2005, I |
| 3 | just want to ask you, was a voice mail message taken |
| 4 | into evidence from HR to SG? |
| 5 | A. Yes. |
| 6 | Q. Okay. And the purpose of that evidence is |
| 7 | to corroborate what? |
| 8 | MR. PAGLIUCA: Object to form and |
| 9 | foundation. |
| 10 | THE WITNESS: It was actually a phone call |
| 11 | from HR to SG confirming an appointment to go |
| 12 | work at Epstein's residence. |
| 13 | BY MR. EDWARDS: |
| 14 | Q. The next line down is what I wanted to |
| 15 | focus on, April 5th, 2005. |
| 16 | This trash pull, what evidence is yielded |
| 17 | from this particular trash pull? |
| 18 | MR. PAGLIUCA: Object to form and |
| 19 | foundation. |
| 20 | THE WITNESS: The trash pull indicated |
| 21 | that there were several messages with written |
| 22 | items on it. There was a message from HR |
| 23 | indicating that there would be an 11:00 |
| 24 | appointment. There were other individuals that |
| 25 | had called during that day. |



| | Page 43 |
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| 1 | JOSEPH RECAREY - CONFIDENTIAL |
| 2 | BY MR. EDWARDS: |
| 3 | Q. And when you would when you would see |
| 4 | females' names and telephone numbers, would you take |
| 5 | those telephone numbers and match it to to a |
| 6 | person? |
| 7 | MR. PAGLIUCA: Object to form and |
| 8 | foundation. |
| 9 | THE WITNESS: We would do our best to |
| 10 | identify who that person was. |
| 11 | BY MR. EDWARDS: |
| 12 | Q. And is that one way in which you |
| 13 | discovered the identities of some of the other what |
| 14 | soon came to be known as victims? |
| 15 | MR. PAGLIUCA: Object to form and |
| 16 | foundation. |
| 17 | THE WITNESS: Correct. |
| 18 | BY MR. EDWARDS: |
| 19 | Q. Okay. There's the second paragraph from |
| 20 | the bottom, it starts, "Detective Leigh provided |
| 21 | trash from 4/06, 4/07/2005." |
| 22 | Do you see that? |
| 23 | A. Yes. |
| 24 | Q. And what is the purpose of the indication |
| 25 | that "the following information was retrieved: Jet |



- 1 JOSEPH RECAREY CONFIDENTIAL
- 2 BY MR. EDWARDS:
- 3 O. And then some of the remaining messages,
- 4 "Johanna, work Sunday at 4 p.m.; A, Monday after
- 5 school; left message for Courtney W and NT, " are
- 6 these individuals that you later learned were
- 7 underaged girls that had been to Jeffrey Epstein's
- 8 home?
- 9 MR. PAGLIUCA: Object to form and
- 10 foundation.
- 11 THE WITNESS: That's correct.
- 12 BY MR. EDWARDS:
- 13 Q. What types of documents do you remember
- 14 retrieving from the trash pulls from Jeffrey
- 15 Epstein's home?
- 16 A. There was numerous items. It was a lot of
- 17 handwritten notes on different -- different pads of
- 18 paper. Some of the pads had names on it, whether it
- 19 was Epstein, whether it was Ghislane Maxwell,
- 20 whether it was -- there were phone messages.
- When I say "phone messages," I mean, you
- 22 know, the kind that come in a book. They are carbon
- 23 copied, so the yellow copy always stays with the
- 24 book, but the white copy is torn off. So there was
- 25 always a carbon copy of the actual phone message.



| | Page 72 |
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| 1 | JOSEPH RECAREY - CONFIDENTIAL |
| 2 | THE WITNESS: Correct. |
| 3 | BY MR. EDWARDS: |
| 4 | Q. And let me go back to the beginning six |
| 5 | pages of that exhibit, No. 4. |
| 6 | MR. PAGLIUCA: Why don't we just make a |
| 7 | copy of it now if we're going to ask questions |
| 8 | about it? I'm not trying to |
| 9 | MR. EDWARDS: Yes, I know. It's just the |
| 10 | first six pages. |
| 11 | (A discussion was held off the record, |
| 12 | after which the following proceedings were |
| 13 | held:) |
| 14 | THE VIDEOGRAPHER: On the record at 10:32. |
| 15 | BY MR. EDWARDS: |
| 16 | Q. And what were some of the items that were |
| 17 | found in well, are the documents that you're |
| 18 | holding, 1 through 6, an accurate reflection of the |
| 19 | items that were found in Jeffrey Epstein's home |
| 20 | during the search warrant execution? |
| 21 | MR. PAGLIUCA: Object to form and |
| 22 | foundation. |
| 23 | THE WITNESS: Yes. |
| 24 | BY MR. EDWARDS: |
| 25 | Q. And I believe that you described that some |



Page 73 1 JOSEPH RECAREY - CONFIDENTIAL 2 of the -- that the house appeared to be -- I don't remember the word you used -- sanitized, for lack of 3 4 a better word? 5 MR. PAGLIUCA: Object to form and foundation. 6 7 BY MR. EDWARDS: 8 Ο. How did you know that? 9 The computers had been removed from the 10 home. 11 How did you know the computers were Ο. 12 removed? 13 Based on -- based on the dangling wires Α. left behind, the monitors left, but the actual CPU 14 of it was missing. 15 16 When you went into the bedroom of Jeffrey 17 Epstein, everything was removed from the -- the shelves, from the armoire. 18 19 Did you find nude photographs of girls? Ο. 20 Α. Yes. 21 Ο. All right. 22 And what did you do with that evidence? 23 That was collected and placed into our Α. 24 crime scene unit. 25 Q. And where is that evidence today?



Page 74 1 JOSEPH RECAREY - CONFIDENTIAL 2 Any evidence that was not returned to its rightful owner was turned over to the FBI. 3 4 0. And evidence which would be nude photographs of girls would be evidence not turned 5 6 back over to Epstein? 7 Α. Correct. 8 MR. PAGLIUCA: Object to form and 9 foundation. 10 THE WITNESS: Some of the items that were collected were later found to be personal items 11 of the houseman, Janush. I recall reviewing 12 13 his personal photographs on -- on a micro SD card for, like, photos of him and his wife or 14 girlfriend at the time. 15 16 BY MR. EDWARDS: 17 And the underaged girls that you had spoken with during your investigation, had they 18 19 described seeing photographs of naked girls in the 20 house? 21 MR. PAGLIUCA: Object to form and 22 foundation. 23 THE WITNESS: Yes, they did. 24 BY MR. EDWARDS: 25 Q. That's something that ran consistent with



Page 78 JOSEPH RECAREY - CONFIDENTIAL 1 BY MR. EDWARDS: 2 3 Q. Okay. Also reflected are the property 4 receipts? MR. PAGLIUCA: Object to form and 5 foundation. 6 7 THE WITNESS: Correct. 8 BY MR. EDWARDS: 9 Q. All right. 10 And where were those taken from, in terms 11 of whose property is that? 12 MR. PAGLIUCA: Object to form and 13 foundation. THE WITNESS: This would have been taken 14 from the home of Jeffrey Epstein. 15 16 BY MR. EDWARDS: 17 And in reviewing that evidence, were you 0. able to substantiate or corroborate certain victims' 18 19 accounts of their allegations of having been at the 20 house? 21 MR. PAGLIUCA: Object to form and 22 foundation. 23 THE WITNESS: Correct. 24 BY MR. EDWARDS: 25 Q. Did you find names of other witnesses and



| | Page 79 |
|----|---|
| 1 | JOSEPH RECAREY - CONFIDENTIAL |
| 2 | people that you knew to have been associated with |
| 3 | the house in those message pads? |
| 4 | MR. PAGLIUCA: Object to form and |
| 5 | foundation. |
| 6 | THE WITNESS: Yes. |
| 7 | BY MR. EDWARDS: |
| 8 | Q. And so what was the evidentiary value to |
| 9 | you of the message pads collected from Jeffrey |
| 10 | Epstein's home in the search warrant? |
| 11 | MR. PAGLIUCA: Object to form and |
| 12 | foundation. |
| 13 | THE WITNESS: It was very important to |
| 14 | corroborate what the victims had already told |
| 15 | me as to calling in and for work. |
| 16 | BY MR. EDWARDS: |
| 17 | Q. Okay. And did you learn the identities of |
| 18 | some of the other individuals associated with |
| 19 | Jeffrey Epstein through the review of that |
| 20 | particular evidence? |
| 21 | MR. PAGLIUCA: Object to form and |
| 22 | foundation. |
| 23 | THE WITNESS: Correct. |
| 24 | BY MR. EDWARDS: |
| 25 | Q. Okay. And what did you do with that |



| | Page 83 |
|----|--|
| 1 | JOSEPH RECAREY - CONFIDENTIAL |
| 2 | BY MR. EDWARDS: |
| 3 | Q. In these messages, did you see messages |
| 4 | that were taken by Ghislane Maxwell or left for |
| 5 | Ghislane Maxwell? |
| 6 | MR. PAGLIUCA: Object to form and |
| 7 | foundation. |
| 8 | THE WITNESS: I do recall seeing messages |
| 9 | utilizing her pad, her stationery. |
| 10 | BY MR. EDWARDS: |
| 11 | Q. Okay. Do you remember messages |
| 12 | specifically that Ms. Maxwell, she is home, or calls |
| 13 | for Ms. Maxwell, or indicating that the person |
| 14 | taking the message is GM? Do you remember those? |
| 15 | A. Yes. |
| 16 | MR. PAGLIUCA: Object to form and |
| 17 | foundation. |
| 18 | BY MR. EDWARDS: |
| 19 | Q. And did that give you further reason to |
| 20 | want to speak to Ghislane Maxwell? |
| 21 | MR. PAGLIUCA: Object to form and |
| 22 | foundation. |
| 23 | THE WITNESS: Correct. I wanted to speak |
| 24 | with everyone in the home and everyone |
| 25 | associated with Jeffrey Epstein. |



Page 97 1 JOSEPH RECAREY - CONFIDENTIAL 2 anything that's found that has any kind of identifiers, any kind of names, phone numbers, 3 4 anything that could be used to identify further victims and/or to corroborate what the information 5 we already obtained, that information would be kept. 6 7 Q. Okay. Be followed up on. 8 9 Ο. You testified earlier about certain pieces of paper that had Ghislane Maxwell's name on it that 10 11 were obtained. Are the documents that are listed, the 12 13 first one, two, three, four pages of Exhibit 8, some of the documents that you're referring to? 14 MR. PAGLIUCA: Object to form and 15 16 foundation. 17 THE WITNESS: That is correct. BY MR. EDWARDS: 18 And if we go through this stack of 19 documents, if you could just review them and tell me 20 if these are some of the items obtained through the 21 22 trash pulls at Jeffrey Epstein's home? 23 MR. PAGLIUCA: Object to form and 24 foundation.



THE WITNESS: That is correct. This is --

25

Page 98 1 JOSEPH RECAREY - CONFIDENTIAL 2 these items were collected in the trash pull. 3 BY MR. EDWARDS: 4 Ο. Okay. And these are items that you felt 5 had some evidentiary value? MR. PAGLIUCA: Object to form and 6 foundation. 7 8 THE WITNESS: Yes. 9 BY MR. EDWARDS: 10 O. Were there other items within the trash 11 that were discarded as not having any apparent evidentiary value? 12 13 Α. Correct. There was stuff like food trash we're not going to keep. You know, an apple core. 14 None of that's going to be kept. 15 16 Ο. Okay. And when you took this stuff into evidence, how was it maintained? 17 A. It was placed in a -- in a sealed 18 19 container, a sealed Ziploc, and placed into 20 evidence. And then was that file later transferred 21 22 to the State Attorney's Office or the FBI? 23 MR. PAGLIUCA: Object to form and 24 foundation.



THE WITNESS: It was collected by the FBI.

25

| | Page 366 |
|----------------------------------|---|
| 2 | |
| 3 | CERTIFICATE |
| 4 | STATE OF FLORIDA) |
| | : ss |
| 5 | COUNTY OF MIAMI-DADE) |
| 6 | I, KELLI ANN WILLIS, a Registered |
| 7 | Professional, Certified Realtime Reporter and |
| 8 | Notary Public within and for The State of |
| 9 | Florida, do hereby certify: |
| 10 | That JOSEPH RECAREY, the witness whose |
| 11 | deposition is hereinbefore set forth was duly |
| 12 | sworn by me and that such Deposition is a true |
| 13 | record of the testimony given by the witness. |
| 14 | I further certify that I am not related |
| 15 | to any of the parties to this action by blood |
| 16 | or marriage, and that I am in no way interested |
| 17 | in the outcome of this matter. |
| 18 | IN WITNESS WHEREOF, I have hereunto set |
| 19 | my hand this 24th day of June, 2016. |
| 20 | |
| 21 | |
| | KELLI ANN WILLIS, RPR, CRR |
| 22 | |
| 23 | |
| 24 | |
| 25 | |
| 19
20
21
22
23
24 | my hand this 24th day of June, 2016. |



UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

VIRGINIA L. GIUFFRE,

Plaintiff,

-against-

Case No.: 15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

- - - - - - - - - - x

CONFIDENTIAL

Videotaped deposition of RINALDO RIZZO, taken pursuant to subpoena, was held at the law offices of Boies Schiller & Flexner, 333 Main Street, Armonk, New York, commencing June 10, 2016, 10:06 a.m., on the above date, before Leslie Fagin, a Court Reporter and Notary Public in the State of New York.

MAGNA LEGAL SERVICES
1200 Avenue of the Americas
New York, New York 10026
(866) 624-6221



- 1 R. Rizzo Confidential
- 2 even Nadia. And what I found very repulsive,
- 3 out of the ordinary, was Nadia was wearing a
- 4 swimsuit that was very revealing and
- 5 basically, her bottom basically went up her
- 6 butt, revealing all of her buttocks. So
- 7 again, in the context not very appropriate
- 8 for the situation.
- 9 Q. Could you tell the relationship of
- 10 age between the three girls that you have
- 11 described and Nadia, for instance?
- MR. PAGLIUCA: Object to the form
- 13 and foundation.
- 14 A. Nadia seemed to be a bit older, I
- 15 would say.
- 16 Q. How does this end, or is there,
- 17 what do you do next? How does this meeting
- 18 that you've just described break up?
- 19 A. I asked to excuse myself and asked
- 20 where the bathroom was, so I'm pointed inside
- 21 the house, to go inside the house to the
- 22 bathroom.
- I walk in there, and I walk, as I'm
- 24 walking to the bathroom, what caught my eye,
- 25 and I had to take a double lock, there were



- 1 R. Rizzo Confidential
- 2 pictures of naked women, half-dressed girls.
- 3 So I went to the bathroom, again, from
- 4 someone, myself working in private service, I
- 5 always know in houses there are cameras, so
- 6 again, I was very reluctant to stare, because
- 7 you never know when you are on camera.
- 8 So I used the bathroom, and I came
- 9 out, and you know, curiosity got the best of
- 10 me, and I leaned over and started looking at
- 11 these pictures for a brief minute, and it was
- 12 just so coincidental that as I did that, Ms.
- 13 Maxwell enters, and she immediately says to
- 14 me that Jeffrey would like for me to rejoin
- 15 the party immediately.
- 16 Q. How many pictures of nude females
- 17 did you see in Jeffrey Epstein's home?
- 18 MR. PAGLIUCA: Object to the form
- 19 and foundation.
- 20 A. I can't recall the exact number.
- Q. Can you describe the pictures that
- 22 you saw in terms of what the people, what the
- 23 people or person within the picture was
- 24 wearing, what the age range would be of the
- 25 person that's in the photograph, any poses,



Page 52 R. Rizzo - Confidential 1 Did you learn whether your 2 perception was correct? 3 MR. PAGLIUCA: Same objection. 4 It was younger. Yes, I did. 5 Α. Ο. How old was this girl? 7 Α. 15 years old. What happens next when Ghislaine 8 Maxwell and Jeffrey Epstein and a 15-year-old 9 girl walk into Eva Anderson's home? 10 MR. PAGLIUCA: Object to the form. 11 Foundation. 12 They proceed into the dining room Α. 13 area, which is across from the living room 14 area. I go into the kitchen and I hear a 15 conversation start. Very muffled, I could 16 not hear any particulars about the 17 conversation whatsoever. 18 19 My wife and I are in the kitchen preparing the evening meal. Eva brings the 20 young girl into the kitchen. 21 In the kitchen, there is an island with three barstools. 22 Eva instructs the young girl to sit to the 23 furthest barstool on the right. 24



Describe for me what the girl

25

0.

- 1 R. Rizzo Confidential
- 2 looked like, including her demeanor and
- 3 anything else you remember about her when she
- 4 walks into the kitchen.
- 5 A. Very attractive, beautiful young
- 6 girl. Makeup, very put together, casual
- 7 dress. But she seemed to be upset, maybe
- 8 distraught, and she was shaking, and as she
- 9 sat down, she sat down and sat in the stool
- 10 exactly the way the girls that I mentioned to
- 11 you sat at Jeffrey's house, with no
- 12 expression and with their head down. But we
- 13 could tell that she was very nervous.
- 14 Q. What do you mean by distraught and
- 15 shaking, what do you mean by that?
- 16 A. Shaking, I mean literally
- 17 quivering.
- 18 Q. What happens next?
- 19 A. We were, again, the absurdity,
- 20 never introduced. Like you would walk into a
- 21 room and say this is -- so my wife and I are
- 22 in the kitchen and this young girl is sitting
- 23 there. It was a very uncomfortable moment.
- 24 I look at my wife. And so I want to ease the
- 25 moment, and so I introduced myself and I



- 1 R. Rizzo Confidential
- 2 introduced my wife, and she doesn't really
- 3 respond.
- And I asked her, are you okay? And
- 5 she doesn't really respond. Nothing verbal,
- 6 no cues, her head is still down. I ask her
- 7 if she would like some water, tissue,
- 8 anything, and she basically doesn't respond.
- 9 Q. You ask her for a tissue?
- 10 A. If she would like a tissue or some
- 11 water at the time.
- 12 Q. Was she crying at the time?
- 13 A. My perception, she was on the verge
- 14 of crying. And I'm trying to loosen the
- 15 situation every way I know how, so the only
- 16 way I knew how, and I thought maybe this will
- 17 comfort her, I said oh, by the way, do you
- 18 work for Jeffrey.
- 19 And she says that, I guess kind of
- 20 made her feel comfortable, because maybe it
- 21 was that comment or my persistence, and she
- 22 said yes. So I said, what do you do? And
- 23 she says I'm Jeffrey's executive assistant,
- 24 personal assistant. Which, from looking at
- 25 her, just didn't seem to suit.



Page 55 R. Rizzo - Confidential 1 And I blurted out: You're his 2 executive personal assistant? What do you 3 And she says I was hired as his 4 5 executive personal assistant. I schedule his appointments. 7 And I'm shocked, and I blurt out: You seem quite young, how did you get a job? 8 How old are you? And she says to me, point 9 10 blank: I'm 15 years old. And I said to her: You're 15 years 11 old and you have a position like that? 12 that point she just breaks down hysterically, 13 so I feel like I just said something wrong, 14 and she will not stop crying. My wife and I 15 were at a loss for words, and I keep on 16 trying to console her, and nothing I was 17 saying, are you all right, do you need a 18 tissue, do you need water, consoles her. 19 And then in a state of shock, she 20 just lets it rip, and what she told me was 21 just unbelievable. 22 23 Q. What did she say? 24 MR. PAGLIUCA: Object to the form



and foundation.

25

- 1 R. Rizzo Confidential
- 2 A. She proceeds to tell my wife and I
- 3 that, and this is not -- this is blurting
- 4 out, not a conversation like I'm having a
- 5 casual conversation. That quickly, I was on
- f 6 an island, I was on the island and there was
- 7 Ghislaine, there was Sarah, she said they
- 8 asked me for sex, I said no.
- 9 And she is just rambling, and I'm
- 10 like what, and she said -- I asked her, I
- 11 said what? And she says yes, I was on the
- 12 island, I don't know how I got from the
- 13 island to here. Last afternoon or in the
- 14 afternoon I was on the island and now I'm
- 15 here. And I said do you have a -- this is
- 16 not making any sense to me, and I said this
- 17 is nuts, do you have a passport, do you have
- 18 a phone?
- 19 And she says no, and she says
- 20 Ghislaine took my passport. And I said what,
- 21 and she says Sarah took her passport and her
- 22 phone and gave it to Ghislaine Maxwell, and
- 23 at that point she said that she was
- 24 threatened. And I said threatened, she says
- 25 yes, I was threatened by Ghislaine not to



Page 57 R. Rizzo - Confidential 1 discuss this. 2 And I'm just shocked. So the 3 conversation, and she is just rambling on and 4 5 on, again, like I said, how she got here, she doesn't know how she got here. Again, I 7 asked her, did you contact your parents and 8 she says no. 9 At that point, she says I'm not supposed to talk about this. I said, but I 10 said: How did you get here. I don't 11 understand. We were totally lost for words. 12 And she said that before she got 13 there, she was threatened again by Jeffrey 14 and Ghislaine not to talk about what I had 15 mentioned earlier, about -- again, the word 16 17 she used was sex. And during this time that you're 18 0. saying she is rambling, is her demeanor 19 continues to be what you described it? 20 21 Α. Yes. 22 Was she in fear? Q. 23 Α. Yes. 24 MR. PAGLIUCA: Object to the form 25 and foundation.



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Page 58
            R. Rizzo - Confidential
1
               You could tell?
 2
          Q.
         Α.
               Yes.
 3
               MR. PAGLIUCA: Same objection.
 5
               She was shaking uncontrollably.
          Α.
               What happens with this 15-year-old
          Ο.
7
    girl next?
               MR. PAGLIUCA: Object to the form
 8
          and foundation.
9
10
               As she is trying to explain, and
          Α.
    I'm asking questions because I'm as feared as
11
    she is at this point. We hear people
12
    approach and she just shuts up.
13
               What happens next?
14
          Q.
               Eva comes in and tells her that she
15
    will be working for Eva in the city.
16
17
               As what?
          Ο.
18
          Α.
               As a nanny.
19
               Did you see this girl again?
          Q.
               Yes.
20
         Α.
               And when?
21
          Ο.
22
          Α.
               On a flight maybe a month or so to
23
    Sweden.
24
               What was the purpose of the flight?
          Q.
25
               We were going to Sweden for the
          Α.
```



Page 59 R. Rizzo - Confidential 1 2 summer. Who was on the flight? Q. The Dubin family. Α. 5 As well as this girl? Q. Α. Yes. 7 What happens? Q. One thing that I forgot to mention 8 Α. is during our initial conversation, I asked 9 her what her name was she said her name 10 11 was 12 What happened with We flew to Sweden, we stopped at an 13 Α. airport that we didn't usually stop at and 14 she got off the plane. 15 Just so that I make sure I 16 0. understand, who it was that she says asked 17 her for sex on the island, who was that? 18 19 MR. PAGLIUCA: Object to the form. Foundation. 20 She didn't specify who asked for 21 sex. She said that they asked for sex. 22 Immediately after that she put Ghislaine and 23 Sarah into the conversation. 24 25 0. Taking her passport?



Page 60 R. Rizzo - Confidential 1 2 Α. Yes. 3 From -- are there any other incidents or occurrences that you observed 4 5 personally with Jeffrey Epstein and Ghislaine Maxwell? 6 MR. PAGLIUCA: Object to the form and foundation. 8 Not that I can recall. 9 This last event that you described, 10 what's the timeframe when that occurred? 11 Late 2004, 2005. 12 When did you resign your employment 13 0. from the Dubin family? 14 I think roughly October. 15 Q. Of what year? 16 17 Α. 2005. 18 Q. Why? My wife and I had discussed these 19 Α. incidents, and this last one was just, we 20 couldn't deal with it. 21 22 When you left your employment with the Dubin family, did you have a job? 23 When we finally left, I stayed on 24 Α. 25 three months after my resignation, I had a



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Page 141
1
 2
                      CERTIFICATE
 3
 5
               I HEREBY CERTIFY that RINALDO
6
    RIZZO, was duly sworn by me and that the
7
    deposition is a true record of the testimony
8
    given by the witness.
9
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11
               Registered Professional Reporter
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               Dated: June 10, 2016
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               (The foregoing certification of
    this transcript does not apply to any
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    of the certifying reporter.)
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Page 1

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----x

June 3, 2016 9:07 a.m.

CONFIDENTIAL

Deposition of DAVID RODGERS, pursuant to notice, taken by Plaintiff, at the offices of Boies Schiller & Flexner, 401 Las Olas Boulevard, Fort Lauderdale, Florida, before Kelli Ann Willis, a Registered Professional Reporter, Certified Realtime Reporter and Notary Public within and for the State of Florida.



Page 18 DAVID RODGERS 1 2 flyer person, then you would reduce it to an 3 initial? MR. PAGLIUCA: Object to form and 5 foundation. MR. REINHART: You can answer the 6 7 question. You can answer the question, if you can R answer the question. You are allowed to answer 9 10 the question, if you understand the question. BY MR. EDWARDS: 11 12 Q. I'm trying to understand your testimony. 13 Is it, if you came to know that person --14 Α. Uh-huh. -- as a frequent flyer passenger, you 15 would begin to reduce that person's name to an 16 17 initial at some point? 18 MR. PAGLIUCA: Same objection. THE WITNESS: Well, we don't really have a 19 frequent flyer program that we do, so to speak. 20 A lot of times I would do it because if you 21 22 would write out everybody's name there is not 23 enough space, you know, to get everybody's name in that little square there. 24 25



Page 34 DAVID RODGERS 1 Q. -- is that right? 2 3 And is that -- is Ghislaine Maxwell 4 somebody that through the years 1995 through 2013 5 was somebody who flew very frequently? 6 What were the years again? Α. 7 The years of this book, 1995 --I wouldn't say through 2013. But, yes, R Α. '95 through 2000 sometime. Probably, I would have 9 10 to go back and -- well, you can see in there. We will get to it. 11 Q. 12 There will be a point where you don't see 13 her much. But to say it went through 2013 would not 14 be accurate. Q. Let's do it this way: The person that you 15 have reflected on numerous notations --16 17 A. Yes. 18 Q. -- through here as GM --19 A. Yes. 20 -- just by the initials, are we able to safely know that that is Ghislaine Maxwell? 21 22 Α. Yes. 23 MR. PAGLIUCA: Object to form and foundation. 24 25 MR. EDWARDS: Court reporter, did you get



Page 35 DAVID RODGERS 1 the answer? 3 THE REPORTER: Yes. The answer came 4 before the objection. BY MR. EDWARDS: 5 6 Q. So on the next flight, the next day, from 7 Palm Beach to SAF. Is SAF Santa Fe? Yes. Α. 9 Q. And it indicates JE and GM. 10 Are we able to then know that those passengers on that flight were Jeffrey Epstein and 11 12 Ghislaine Maxwell? 13 A. Yes. 14 MR. PAGLIUCA: Object to form and foundation. 15 16 BY MR. EDWARDS: Q. And where would you land at SAF? Is that 17 18 an airport? 19 It is an airport. Α. 20 Is it a private airport? 21 No. It's -- airlines go in there. 22 Did Jeffrey Epstein also have a landing Q. 23 strip at his property in New Mexico? 2.4 He did at one time. Α. 25 What would that -- do you remember what Q.



Page 36 DAVID RODGERS 1 that code would be? 2 3 I don't believe there was a code. All right. Were there times that you landed either the Gulfstream or the Boeing --5 6 Α. No. 7 Q. No. MR. REINHART: Let him finish the question R 9 before you answer. 10 THE WITNESS: Oh, I'm sorry. BY MR. EDWARDS: 11 Sure. We are doing fine so far. But the 12 Ο. 13 court reporter is taking down all of our questions 14 and all of our answers. We are communicating well. A. Okay. 15 But when I go to read this back, we may 16 17 not get that. 18 Okay. Go ahead. Α. Q. So were there times where you landed one 19 of Jeffrey Epstein's planes on his private landing 20 strip at the New Mexico property? 21 22 Α. Yes. But not the Gulfstream and not the 23 Boeing. What plane did you land on his property? 24 Q. 25 The Cessna 421. And probably a Α.



Page 96 DAVID RODGERS 1 9:00, so it is 20 to 11:00 here. 2 BY MR. EDWARDS: 3 Ο. So I want to go to page 41, and down to 5 December 9th. Sorry. December 11. 6 Okay. Α. 7 Palm Beach to Teterboro. Q. Yeah. R Α. 9 And who are the passengers? Jeffrey Epstein, Ghislaine Maxwell, Emmy 10 Tayler, Virginia. 11 And this appears to be the first time that 12 Q. 13 Virginia's name appears in the log? 14 A. Right. 15 Is there a -- is there a reason why the first time -- I notice that the first time on some 16 of the other passengers, you use a first and last 17 18 name. Is there any reason why you didn't use her first and last name? 19 A. I probably didn't know her last name. 20 Just didn't catch it. 21 Q. 22 Α. Yes. Okay. It was not that somebody told you 23 not to use the last name? 24 25 Α. No. No.



Page 97 DAVID RODGERS 1 2 So that flight goes from Palm Beach to 3 Teterboro. 4 Can you remember whether that's the first 5 time that you flew on a plane with Virginia Roberts? 6 MR. PAGLIUCA: Object to --7 THE WITNESS: I believe it is. MR. PAGLIUCA: Object to form and R foundation. 9 10 BY MR. EDWARDS: Do you remember the flight? 11 Q. 12 Α. No. 13 The next flight three days later goes from Teterboro to Virgin Islands with Jeffrey Epstein, 14 Ghislaine Maxwell, Adam Perry Lang, and Virginia; is 15 that right? 16 17 A. Yes. And below that, it says, "Reposition." 18 Ο. What does that mean? 19 20 We were taking the airplane with no Α. passengers to go into maintenance, or an OPS2 21 22 inspection. 23 Okay. This is -- this is the same Gulfstream, is that right? 24 25 Α. Yes.



Page 98 DAVID RODGERS 1 2 How many passengers would that Gulfstream 3 allow? Twelve passengers, I believe. 5 Q. And do you know how Jeffrey Epstein, Ghislaine Maxwell, Adam Perry Lang, and Virginia get 6 off of St. Thomas or leave the island? 7 No. I do not. Probably a charter, I'm 8 Α. guessing. 9 If -- who would fly the -- well, is there 10 any other plane that Jeffrey Epstein was able to 11 access back then that was a private plane? 12 13 MR. PAGLIUCA: Object to foundation. 14 THE WITNESS: No. At that point in time we don't have the Boeing yet. 15 BY MR. EDWARDS: 16 Q. So how many airplanes did Jeffrey Epstein 17 back then? 18 A. Well, we -- I don't know if we had the 421 19 then. We may or may not have. But it wouldn't --20 you know, you wouldn't be flying the 421 down to 21 22 St. Thomas with Jeffrey. It is too long of a 23 flight. The Cessna? 24 Q. 25 The Cessna 421, correct. Α.



Page 99 DAVID RODGERS 1 2 Q. Okay. 3 But I'm not even sure we still had it at this point in time. 5 Q. Yeah. It shows up on the next page. We 6 will get there. 7 Does it? Okay. Α. 8 So then, yes, the answer is, yeah, we 9 still had the airplane. But we wouldn't have used 10 that. So is there any way of telling how Jeffrey 11 Ο. Epstein, Ghislaine Maxwell, Adam Perry Lang, and 12 Virginia were in the Virgin Islands on that, from 13 14 December 14th, 2000 --15 MR. PAGLIUCA: Object to foundation. BY MR. EDWARDS: 16 17 O. -- based on your knowledge or your logs or 18 anything else? A. No, I wouldn't have any way of knowing. 19 20 Q. Okay. Because the next flight that they are on 21 22 was like this Palm Beach one, January 16th. So I 23 wouldn't have any idea. Okay. To your knowledge, did Jeffrey 24 Q. 25 Epstein ever fly commercially?



Page 100

- 1 DAVID RODGERS
- 2 A. He probably has. Back then at this time,
- 3 I'm going to say probably not. But I know that he
- 4 has flown commercially. But usually that would be
- 5 like going to Europe, maybe.
- 6 Q. Okay. January 16th through the 25th,
- 7 those flights, do you see that block that I'm
- 8 talking about?
- 9 A. Yes.
- 10 Q. Jeffrey Epstein, Ghislaine Maxwell, Emmy
- 11 Tayler, and then at times Shelly Lewis, do you see
- 12 that?
- 13 A. Yes, right.
- 14 Q. The 25th it lands in Teterboro. And the
- 15 next day, on the 26th, leaves out of Teterboro with
- 16 Jeffrey Epstein, Ghislaine Maxwell, Emmy Tayler, and
- 17 Virginia Roberts. This time you wrote the whole
- 18 name.
- 19 A. Right. Right.
- 20 Q. So when you write the full name, does that
- 21 signify -- that's when you may have learned her last
- 22 name?
- 23 A. Correct.
- Q. And do you know how she -- how she got up
- 25 to New Jersey or New York?



Page 101 1 DAVID RODGERS I do not. I would guess the airlines. 3 At this point in time, did you know what 4 her -- what her relationship was with Jeffrey 5 Epstein or Ghislaine Maxwell? MR. PAGLIUCA: Object to form. 6 7 THE WITNESS: No. 8 BY MR. EDWARDS: 9 Q. Did you -- was she a masseuse? 10 MR. PAGLIUCA: Object to foundation. THE WITNESS: I -- I'm not sure what she 11 12 was. BY MR. EDWARDS: 13 Did you form any -- any belief that she 14 was a friend or a business associate or anything? 15 16 MR. PAGLIUCA: Object to foundation. 17 THE WITNESS: Well, I mean, we had a lot of people on the airplane. And Virginia was 18 19 just another one of those passengers. BY MR. EDWARDS: 20 21 Okay. So on the 26th, flies to Palm Beach. And then -- and then I guess the 27th --22 23 Right. Α. 24 -- leaves from Palm Beach to the Virgin Islands --25



Page 102 DAVID RODGERS 1 2 Α. Yes. 3 Q. -- with Jeffrey Epstein, Ghislaine Maxwell, Emmy Tayler, and Virginia Roberts, right? 5 Α. Yes. 6 And on the 30th, you fly it back. That's Ο. 7 still the Gulfstream, right? Yes. 8 Α. 9 From the Virgin Islands to Palm Beach with 10 the same four passengers, correct? Yes. 11 Α. And that's Jeffrey Epstein, Ghislaine 12 13 Maxwell, Emmy Tayler, and Virginia Roberts? 14 Α. Correct. And then what happens to that plane, the 15 Gulfstream, for the next month, from February 1st 16 17 through March 5th? Well, I don't know what happened to it, 18 but I'm -- from, looks like February 17th, I'm going 19 to school to get a type rating on the Boeing. And 20 I'm gone for about three weeks. 21 22 So this is when you're doing a simulator 23 on the Boeing? Correct. 24 Α. 25 And getting your certification to fly the Q.



Page 103 DAVID RODGERS 1 2 Boeing? 3 Α. Yes. The Boeing, was that previously owned by Ο. 5 The Limited or Les Wexner? 6 Α. I'm not sure of the company name, 7 officially. But probably, yes. Some association with him? 8 Ο. 9 Some association, yes. Do you know who flew the Gulfstream while 10 you were doing the simulator? 11 Well, it would have been Larry Visoski, 12 Α. 13 I'm not sure who the first officer was. 14 Q. Do you know if any logs were kept of the 15 passengers' names? A. While I was at school? 16

- Q. Right, while you were at school.
- 18 A. There probably were logs, but I don't know
- 19 where they are.
- Q. Have you ever spoken with Larry about
- 21 whether he kept names of passengers?
- 22 A. I don't think he does.
- Q. Do you know where Larry Visoski flew the
- 24 Gulfstream for the month that you were --
- 25 A. No.



Page 104 DAVID RODGERS 1 2 Sorry. Just let me finish my question. 3 know I was getting it out slow. 4 -- but for the month that you were 5 training on the Boeing? 6 Α. No. 7 All right. So the last flight that you Ο. took in the Gulfstream before you began, before you 8 flew the Cessna for a day, I guess, right, from 9 10 Santa Fe to DFW --Right. 11 Α. -- February 3rd --12 13 Α. Yes. 14 Q. And that's the Cessna with 908GM tail 15 number? 16 Α. Yes. 17 The last flight that you flew on the Gulfstream was the flight back from St. Thomas with 18 Jeffrey Epstein, Ghislaine Maxwell, Emmy Tayler, and 19 Virginia Roberts, right? 20 A. Uh-huh. 21 22 And then the next time that you're on the 23 plane is -- on the Gulfstream is when? It looks like March the 5th. 24 Α. 25 And who are the passengers on that flight? Q.



Page 105 DAVID RODGERS 1 Where is it going to? 2 3 Jeffrey Epstein, Ghislaine Maxwell, Emmy Tayler, Virginia Roberts. 5 Q. And then there's notation of Gary 6 Roxborough? 7 Yes. Α. Do you know why that is? R Ο. 9 Yeah. He was the first officer. Α. Why did he become the first officer? 10 11 Because Larry was probably in training for the Boeing. 12 13 Q. Okay. You took -- you alternated? 14 Right. We didn't go at the same time. 15 All right. Then the Gulfstream has the same aircraft make and model. That's the same 16 17 Gulfstream airplane, right? 18 A. Yes. But the aircraft identification mark 19 20 changes --A. Correct. 21 22 -- on March 5th, 2001. 23 Α. Correct. 24 And it changes to N -- it changes from Q. 25 N908JE to N909JE.



Page 106 DAVID RODGERS 1 2 Α. Yes. 3 Q. Why was that? Because the N908JE went to the Boeing. 5 That was going to be on the Boeing now. 6 And the new number for N909JE was 0. 7 transferred to the Gulfstream? Correct. R Α. 9 And where does that first flight on the 5th qo? 10 From Palm Beach to Stephenville up in 11 Newfoundland for a fuel stop. 12 13 Q. Okay. And then how do you know it is a fuel stop? 14 Because we are going to Paris, and so we 15 have to stop there for fuel. 16 O. Okay. I know how -- I know how you would 17 know that. But is there any indication on any of 18 the numbers that go off to the right that would tell 19 me that it's a fuel stop as opposed to --20 A. No. 21 22 No? Okay. All right. So there's no way after today's deposition I can look at any of the 23 numbers; it's not going to tell me what it was for? 24 25 Α. No. No. And it's -- obviously it looks



Page 107 DAVID RODGERS 1 different, because one day is the 5th; one day is 2 the 6th. But we landed there like at 11:50 at night. And then when we took off, it was, you know, 5 the next day. 6 Ο. Okay. Got it. 7 And then where do you go the next day? We went from Stephenville to 8 Α. Paris-Le Bourget. 9 10 And who were the passengers going to Paris? 11 Jeffrey Epstein, Ghislaine Maxwell, Emmy 12 13 Tayler, and Virginia Roberts. 14 Q. And then what's the next flight? 15 A. On the 8th, from Paris to -- I believe that is in Spain. 16 Granada, Spain? 17 Ο. 18 Granada, Spain. Correct. 19 Okay. And who are the passengers on that Q. 20 trip? Jeffrey Epstein, Ghislaine Maxwell, Emmy 21 22 Tayler, Virginia Roberts, Alberto and Linda Pinto, 23 one female, and Ricardo, it looks like Orieta. And then what's the next flight? 24 Q. 25 From there to Tangiers. From Granada to Α.



Page 108 DAVID RODGERS 1 2 Tangiers. When you landed -- sorry to go back --3 when you landed in -- what did we say LEGR was? 5 Α. Granada, Spain. 6 Where did -- where did you stay? Where do Ο. 7 you stay on those trips? Α. We didn't stay. We left the same day, I 8 9 believe. 10 Ο. Okay. What if we go back to one flight to 11 LFPB? Uh-huh. LFPB. 12 Α. 13 Q. That's Paris? 14 Α. Yeah. We stayed in Paris. 15 Q. And do --A. We stayed there. 16 17 Q. Do you know -- do you stay at the same 18 location where Jeffrey Epstein, Ghislaine Maxwell, Emmy Tayler, and Virginia Roberts stay? 19 20 A. No. Where do you stay while you are in Paris? 21 22 Α. Hotel. 23 Q. Where do they say? 24 MR. PAGLIUCA: Object to foundation. 25 THE WITNESS: He has a place there, in



Page 109 DAVID RODGERS 1 2 Paris. 3 BY MR. EDWARDS: Ο. Okay. Jeffrey Epstein has a home or a 5 house in Paris? 6 Α. Right. 7 Okay. Have you been to it? Q. Yes, I believe I have. R Α. 9 Have you ever stayed there? 10 Α. No. And getting to and from the airport, were 11 you ever in the car riding to or from the airport in 12 13 Paris with Jeffrey Epstein? 14 A. No. Q. So going down to the 9th, then, where is 15 that flight? 16 A. That is from Tangiers to London Luton 18 Airport. And is Luton Airport, is that a major 19 20 airport? A. For general aviation it is. There is 21 22 airline service in there, but it is not a huge one, 23 for sure. Who were the passengers? 24 Q. 25 Jeffrey Epstein, Ghislaine Maxwell, Emmy Α.



Page 110 DAVID RODGERS 1 Tayler, and Virginia Roberts. 2 And am I reading this correctly that the 3 Q. next flight is two days later, on the 11th? 5 Α. Yes. 6 And where does the flight on the 11th go? Ο. 7 From Luton to Bangor, Maine. All right. While in London, do you know 8 9 what Jeffrey Epstein, Ghislaine Maxwell, Emmy Tayler, and Virginia Roberts did? 10 No, I do not. 11 Α. Do you know who they saw? 12 13 Α. No, I do not. 14 After the flight to Maine, where is the 15 next flight? Maine is from Bangor to Teterboro the same 16 Α. 17 day. 18 Ο. Okay. 19 Α. So that was a fuel stop. 20 MR. EDWARDS: All right. We are at a good time to stop. The videographer has to change 21 22 tapes. 23 THE WITNESS: Okay. 24 MR. EDWARDS: So we why don't we take a 25 five-minute break.



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Page 111
1
                          DAVID RODGERS
              THE WITNESS: Okay.
              THE VIDEOGRAPHER: Off the record at
4
         10:57.
5
              (Thereupon, a recess was taken, after
         which the following proceedings were held:)
6
7
              THE VIDEOGRAPHER: This is the beginning
         of Disk 2. On the record at 11:12.
8
9
    BY MR. EDWARDS:
         Q. Sure. If we go back to page 41,
10
    December 7th, 2000.
11
12
              MR. PAGLIUCA: Give us a Bates page,
         please.
13
              MR. EDWARDS: Right, 41. For the
14
         remainder, when I say "page," I'm really just
15
16
         referring to the Bates number.
17
    BY MR. EDWARDS:
             So page 41, December 7th, 2000.
18
         Q.
         Α.
19
              Okay.
              Do you see that?
20
         Q.
21
              Where was that flight going from and to?
22
             Luton to -- Luton -- that's going into
23
    Marham Air Force Base.
24
             Do you remember why you would have flown
         Ο.
    into the Air Force base?
25
```



Page 112 DAVID RODGERS 1 2 We flew in there to drop the passengers 3 off. And then these passengers that were on there, we dropped them off. And then -- let's see. 5 repositioned. 6 I don't remember. We dropped passengers 7 off, and we had to leave, I believe. Okay. That was --R Ο. 9 We weren't allowed to stay there. 10 Ο. That was Tom Pritzker? Yes. 11 Α. And then did you also drop off Jeffrey 12 Q. 13 Epstein, Ghislaine Maxwell, Kelly Spamm? 14 Α. Yes. Q. Okay. 15 I believe everyone got off the airplane 16 17 there. And where did you reposition to? 18 It says, "Positioned in Norwich, England." 19 Α. I guess it's Norwich. 20 Sandringham, that is what it says right 21 22 above that. What is that? 23 Sandringham. I believe Sandringham is the estate that the queen has --24 25 Q. Okay.



Page 113 DAVID RODGERS 1 2 Α. -- near there. 3 Q. All right. And the flight on December 9th --5 Α. Uh-huh. 6 That's Jeffrey Epstein, Ghislaine Maxwell, Ο. 7 Emmy Tayler, Kelly Spamm? Α. Right. 8 9 And then what did you write in the parenthesis under that? 10 "Blowing snow on runway." It was a great 11 weird phenomenon that happened that night. 12 13 Q. And then you're leaving out of that Sandringham Airport; is that right? 14 15 Α. We are -- which one are you on? On the 9th. 16 O. On the 9th --17 18 The first entry on the 9th. Ο. The 9th, we're leaving, looks like 19 Norwich, England, I believe, EGSH, and we go to 20 Gander, Newfoundland --21 22 Q. Okay? 23 -- for a fuel stop. 24 I think before we took a break that we Q. 25 were on page 43.



| | Page 114 |
|----|---|
| 1 | DAVID RODGERS |
| 2 | A. Uh-huh. |
| 3 | Q. And the flight that began in Palm Beach, |
| 4 | before going to Paris and Belgium, Tangier, I think |
| 5 | you told me, it ended up in Maine |
| 6 | A. Correct. |
| 7 | Q on March 11th, 2001. |
| 8 | A. Right. |
| 9 | Q. Or, sorry, it ended up in Teterboro. |
| 10 | A. Teterboro. |
| 11 | Q. Okay. And then on the 15th, you fly |
| 12 | from on the Gulfstream out of Teterboro to ISP. |
| 13 | Do you know where that is? |
| 14 | A. Islip, New York. |
| 15 | Q. Okay. And Virginia Roberts was on the |
| 16 | flight that landed in Teterboro on the 11th, |
| 17 | correct? |
| 18 | MR. PAGLIUCA: Object to form and |
| 19 | foundation. |
| 20 | THE WITNESS: Yes. |
| 21 | BY MR. EDWARDS: |
| 22 | Q. But leaving out of Teterboro, she's not |
| 23 | one of the passengers on the flight. |
| 24 | A. No. |
| 25 | Q. Any idea where she went? |
| I | |



| | Page 115 |
|----|--|
| 1 | DAVID RODGERS |
| 2 | A. No. |
| 3 | Q. Okay. |
| 4 | MR. PAGLIUCA: Are you referring to |
| 5 | Bates 0041, the 11th through 14th? Is that |
| 6 | what you're talking about? |
| 7 | MR. EDWARDS: Forty-three. |
| 8 | MR. PAGLIUCA: Forty-three. |
| 9 | MR. EDWARDS: March 11th and March 15th, |
| 10 | 2001. |
| 11 | MR. REINHART: If it will help there, the |
| 12 | flight numbers column, like the fifth or sixth |
| 13 | column over, are sequentially numbered and |
| 14 | unique numbers. So if you want to just say |
| 15 | "flight 1468" |
| 16 | MR. EDWARDS: Okay. |
| 17 | MR. REINHART: that might help |
| 18 | everybody |
| 19 | MR. EDWARDS: Right. |
| 20 | MR. REINHART: follow along. |
| 21 | MR. EDWARDS: Okay. Thanks, Bruce. |
| 22 | MR. REINHART: Uh-huh. |
| 23 | BY MR. EDWARDS: |
| 24 | Q. So the flight now that I'm talking about |
| 25 | that leaves out of Teterboro on the 15th, flight |
| | |



Page 116 DAVID RODGERS 1 No. 1471 --2 3 Α. Right. -- the passengers appear to be Jeffrey 5 Epstein, Ghislaine Maxwell, Adam Perry Lang, Alexia 6 Wallert and Banu Cukuqlu? 7 I think so. Α. Do you remember Banu? 8 9 I definitely remember that. It was a hard 10 name to spell. Yeah. Sort of, I guess. I mean, if she 11 walked in right now, I probably wouldn't recognize 12 13 her. 14 Q. Well, it has been since 2001, so --15 Yeah, I know. Okay. So then the next flight is 1472. 16 17 Where is that? Where is that going? 18 A. From Islip to Lake City, Florida. All right. And the passengers, again, are 19 Q. who? 20 Jeffrey Epstein, Ghislaine Maxwell, Adam 21 Α. 22 Perry Lang, Alexia Wallert and Banu Cukuglu, 23 whatever her name is. Did you know what relationship she had, if 24 Q. 25 at all, with Jeffrey Epstein?



| | Page 117 |
|----|--|
| 1 | DAVID RODGERS |
| 2 | A. No. No. |
| 3 | Q. Do you remember an Ed Tuttle? |
| 4 | A. Yes. |
| 5 | Q. And who was he? |
| 6 | A. I believe Ed was a, probably in |
| 7 | construction. I think he may have been around |
| 8 | before the Jeffrey well, let me think. |
| 9 | Q. If we skip down to March 16th, I see his |
| 10 | name. So I don't know if that's going to help you. |
| 11 | A. I believe I believe Ed Tuttle was like |
| 12 | maybe an architect, or somewhere in the |
| 13 | construction, real estate side, I believe. |
| 14 | Q. Okay. So flight No. 1477 |
| 15 | A. Uh-huh. |
| 16 | Q from LaGuardia to Palm Beach, is that |
| 17 | Jeffrey Epstein, Ghislaine Maxwell, Emmy Tayler, Joe |
| 18 | Pagano, Eva Dubin? |
| 19 | A. Yes. |
| 20 | Q. Celina Dubin? |
| 21 | A. Yes. |
| 22 | Q. Jordan Dubin? |
| 23 | A. Right. |
| 24 | Q. Maya Dubin and two nannies? |
| 25 | A. Yes. |
| 1 | |



| | Page 118 |
|----|--|
| 1 | DAVID RODGERS |
| 2 | Q. And Alexia Wallert? Is that what that is? |
| 3 | A. I would assume so, yes, AW. |
| 4 | Q. That is sort of what we talked about in |
| 5 | the beginning, where Alexia Wallert appears in full |
| 6 | name at the top |
| 7 | A. Right. |
| 8 | Q and it's AW, AW. |
| 9 | A. And there's no room to write her name out |
| 10 | there |
| 11 | Q. Right. |
| 12 | A so she's AW. |
| 13 | Q. Okay. And then the next flight, the 27th, |
| 14 | leaves out of Palm Beach. Who are our passengers on |
| 15 | that flight and where's it going? 1478 is the |
| 16 | flight. |
| 17 | A. Yeah. Jeffrey Epstein, Ghislaine Maxwell, |
| 18 | Emmy Tayler, Virginia Roberts, two females, Banu, |
| 19 | and that's it. |
| 20 | Q. And do you know, in New York, when that |
| 21 | plane lands in Teterboro, where do you stay when the |
| 22 | plane is up there? |
| 23 | A. It is 2001. At an apartment there. |
| 24 | Q. Did you have your own apartment? |
| 25 | A. Yes. |



Page 119 DAVID RODGERS 1 Q. Or did you stay at one of Jeffrey 2 3 Epstein's apartments? No. It was his apartment, Jeffrey's 5 apartment. 6 Was that one of the apartments at 301 East Ο. 7 66th Street? Α. Yes. 8 9 And did any of the other passengers from that flight, that 1478, did any of them stay at any 10 of those apartments? 11 A. Yeah. Emmy would have. Virginia probably 12 13 did. 14 Q. Did you see Virginia stay at the 15 apartment? A. I don't know. 16 17 Q. When you were in New York and you left

- 18 from the airport, did you ride in the same car with
- Virginia? 19
- A. Not usually. I mean, I don't know if we 20
- ever did. It's possible we did. 21
- 22 Do you know whether Virginia Roberts
- 23 stayed at Jeffrey Epstein's townhouse or whether
- Virginia Roberts stayed at the apartments? 24
- 25 MR. PAGLIUCA: Object to form.



Page 120 DAVID RODGERS 1 2 THE WITNESS: I don't know for sure. 3 4 BY MR. EDWARDS 5 Q. Can you recollect riding in a car with her, or can you recollect whether she got in a car 6 with anyone else? MR. PAGLIUCA: Object to form. 9 THE WITNESS: I can't. 10 MR. EDWARDS: Okay. MR. REINHART: I'm sorry. Are you asking 11 12 about that specific trip or --MR. EDWARDS: Sorry. 13 14 BY MR. EDWARDS: 15 I mean that specific trip. 16 A. No. I can't. 17 How about in general at any time? Α. 18 No. I don't recall. I mean, I can recall, I would ride sometimes with Emmy, with Adam 19 I remember them being in the car. But, again, that 20 21 was unusual. Usually it would just be Larry and myself. But on occasion, you know, somebody might 22 23 ride with us. When you would stay at the apartment in 2.4 Q. New York on East 66th Street, would it always be in 25



Page 121 DAVID RODGERS 1 2 the same apartment? 3 Α. Yes. Ο. All right. There are multiple apartments 5 owned by Jeffrey Epstein? 6 At that time, it was the same apartment. 7 Okay. Have you stayed in other apartments Ο. since that time? 8 9 Yes. Α. All at that East 66th Street location? 10 Yes. I really don't -- I don't have an 11 apartment there now. We haven't gone there since 12 13 probably 2008. 14 Q. How about Banu? Would she have stayed at 15 301 East 66th Street? MR. PAGLIUCA: Object to foundation. 16 THE WITNESS: Most likely. 17 BY MR. EDWARDS 18 Why do you say that? 19 20 Well, if she's on the plane with us on multiple trips, then most likely she probably stayed 21 22 there. 23 Have you been to Jeffrey Epstein's townhouse as 9 East 71st Street? 24 25 Α. Yes.



| | Page 122 |
|----|--|
| 1 | DAVID RODGERS |
| 2 | Q. And it's a pretty big place, right? |
| 3 | A. Pretty big. |
| 4 | Q. And it has numerous bedrooms? |
| 5 | A. Yes. |
| 6 | Q. Any reason why Banu would not have been |
| 7 | staying there? |
| 8 | MR. PAGLIUCA: Object to foundation. |
| 9 | THE WITNESS: I don't know. |
| 10 | BY MR. EDWARDS |
| 11 | Q. I'm just trying to get to, is there a |
| 12 | reason why you believe that Banu would have, I think |
| 13 | you said, probably have stayed at the apartment |
| 14 | versus the townhouse? |
| 15 | A. Well, I only say that because Emmy, you |
| 16 | know, stayed there. |
| 17 | Q. Stayed where? |
| 18 | A. At the at our apartments. |
| 19 | Q. Okay. |
| 20 | A. I'm pretty sure Adam, yeah, Adam stayed |
| 21 | there at the time. So most of the people that were |
| 22 | regulars on the flight, they would stay there in the |
| 23 | apartments. |
| 24 | Q. Okay. But do you remember Virginia or |
| 25 | Banu staying in the apartments? |



| | Page 123 |
|----|---|
| 1 | DAVID RODGERS |
| 2 | A. I do not specifically. |
| 3 | Q. Okay. The next flight on the next day, |
| 4 | 1479, is flying from Teterboro to Santa Fe; is that |
| 5 | right? |
| 6 | A. Yes. |
| 7 | Q. And who are those passengers? |
| 8 | A. Jeffrey Epstein, Ghislaine Maxwell, Adam |
| 9 | Perry Lang, Virginia Roberts, Banu, Marvin Minsky, |
| 10 | Henry Jarecki. |
| 11 | Q. Do you remember Marvin and Henry? |
| 12 | A. I remember Henry. I don't really remember |
| 13 | Marvin. |
| 14 | Q. Okay. And then two days later again, |
| 15 | where would you have stayed if you landed in |
| 16 | Santa Fe on March 29th, 2001? |
| 17 | A. Probably would have stayed at the ranch. |
| 18 | Q. At the Zorro Ranch? |
| 19 | A. Yes. |
| 20 | Q. All right. Did the other passengers that |
| 21 | were on the plane, Jeffrey Epstein, Ghislaine |
| 22 | Maxwell, Adam Perry Lang, Virginia Roberts, Banu |
| 23 | I'm not evening going to try her last name |
| 24 | A. Right. |
| 25 | Q Marvin Minsky and Henry Jarecki also |



Page 124 DAVID RODGERS 1 2 have stayed at the ranch? MR. PAGLIUCA: Object to foundation. 3 THE WITNESS: I'm going to say most likely 5 they did. 6 BY MR. EDWARDS 7 Was there any other location in Santa Fe Q. where you are aware passengers would have stayed? 8 9 Not that I'm aware of. 10 If you were all going to the same place, is that an occasion where you would all ride in the 11 same vehicle from the airport to the ranch? 12 13 MR. PAGLIUCA: Object to foundation. 14 THE WITNESS: I don't know. 15 BY MR. EDWARDS Q. You would still right in separate 16 17 vehicles? A. Right. Because it takes us about an hour 18 19 to finish up at the airport. 20 Q. And then the 31st, so two days? A. Let me go back to that one --21 22 Q. Sure. 23 -- and say, it is possible. I think Adam has ridden with us before. So I couldn't swear that 24 25 one way or the other. But he has probably ridden



Page 125

- 1 DAVID RODGERS
- 2 with us before to the airport; to or from the
- 3 airport.
- 4 Q. Two days later, flight No. 1408 out of
- 5 Santa Fe to Palm Beach, who were the passengers
- 6 there?
- 7 A. Jeffrey Epstein, Ghislaine Maxwell, Prince
- 8 Andrew, Virginia Roberts, Nadia Bjorlin, Henry
- 9 Jarecki, Marvin Minsky.
- 10 Q. Do you remember when you were at the ranch
- 11 Nadia Bjorlin arriving?
- 12 A. I would assume that she airlined in there.
- 13 Q. Do you remember her at the ranch? Did she
- 14 perform for you or anything?
- 15 A. No.
- I don't remember her at the ranch. I
- 17 mean, I'm sure she was there. I just don't
- 18 remember.
- 19 Q. Okay. Do you remember a person named
- 20 Heather Mann? She's found on flight 1438 next to
- 21 Lydia.
- 22 A. Heather Mann, not really.
- Q. Okay. The next flight, on page 45, is
- 24 1488. The flight number. April 9th, 2001.
- 25 A. Right.



Page 126 DAVID RODGERS 1 2 Where does that flight take off from and 3 where does it go? Palm Beach to Atlantic City. 5 Q. Who is on that flight? 6 Jeffrey Epstein, Emmy Tayler, Virginia Α. 7 Roberts, Banu and Johanna. Do you remember Johanna Sjoberg? R Ο. 9 I don't. Α. 10 On that same day, you take a flight to Teterboro? 11 12 Α. Right. 13 Did you go to the casinos at all that day? I don't think so. 14 15 Would that be something that you would do with them? Or you would stay back? 16 17 No. We would stay at the airport. Α. All right. 18 O. And then two days later, on the 11th, 19 flight 1490, the plane flies out of Teterboro. 20 For that two-day period of time, the night 21 22 of the 9th and the night of the 10th, would you have 23 stayed at the apartment? MR. PAGLIUCA: Object to foundation. 24 25 MR. EDWARDS: In New York.



Page 127 DAVID RODGERS 1 2 THE WITNESS: I would say, yes. 3 BY MR. EDWARDS: Ο. All right. Do you know where Virginia and 5 Banu and Johanna stayed? 6 Α. No idea. 7 You can't recollect whether they were --Q. 8 you can't recollect seeing them at the apartments? 9 MR. PAGLIUCA: Object to foundation. 10 THE WITNESS: No. BY MR. EDWARDS: 11 All right. 12 Q. 13 Then on the 11th, you leave from Teterboro 14 and go to where? 15 A. St. Thomas. Q. That is flight 1490. And on that flight, 16 17 Jeffrey Epstein, Ghislaine Maxwell, Prince Andrew, Banu, Virginia Roberts and Johanna? 18 A. Yes. 19 Q. And that is -- that is a flight -- how 20 does -- how did those passengers get from -- does 21 22 Jeffrey Epstein have a place in St. Thomas? 23 MR. PAGLIUCA: Object to form. 24 THE WITNESS: Well, yes. 25



Page 128 DAVID RODGERS 1 BY MR. EDWARDS: 2 3 Q. Where is that? In St. Thomas, he has an office. In St. 5 Thomas. Where does he stay in the Virgin Islands? 6 Ο. 7 On Little St. James. And how do the passengers get from R 0. St. Thomas to Little St. James? 9 Most likely, helicopter. 10 How many people does the helicopter fit? 11 We didn't own a helicopter then. 12 13 Probably -- probably 5. It depends, 14 because they had different helicopters. I'm not sure which one they used that day. 15 What is the duration of the flight from 16 Ο. 17 St. Thomas to Little St. James? About six minutes. 18 What is the duration of a boat trip from 19 Little St. James to St. Thomas? 20 Probably about, let's say, 15 to 20 21 22 minutes. But you are on the east side of the island 23 and the airport is almost to the west side of the island. 24 25 So you have to almost circle the island? Q.



Page 129 DAVID RODGERS 1 2 To get from the island by boat, to get 3 to -- there's land there and take a car, it is probably -- it is probably close to an hour, 45 5 minutes for sure. Are there passenger manifests that are 6 7 kept for the helicopters? MR. PAGLIUCA: Object to foundation. R 9 THE WITNESS: I'm not sure. I'm not sure. 10 BY MR. EDWARDS: Back in this time, in around April of 11 Ο. 2001, did Jeffrey Epstein have a helicopter yet? 12 13 No, he did not have a helicopter. 14 Q. At that time? 15 Correct. Α. And so do you remember the name of the 16 17 company or corporation that they rented or transported? 18 19 I don't. It was the only -- helicopter service there in St. Thomas is no longer there. 20 21 Q. Okay. 22 Air Center Helicopter. 23 Was there a particular person at Air Center Helicopter that you ever coordinated with? 24



We would, like, call a dispatcher. Or you

25

Α.

Page 130 DAVID RODGERS 1 2 know, whoever picked up the phone, we would call 3 them. Q. All right. So 1491 is a flight from 5 St. Thomas to Palm Beach; is that right? 6 Α. Yes. 7 And Gwendolyn Beck is now on that flight? Q. R Α. Yes. 9 Do you remember that flight at all, 1491? Q. Α. 10 Not really. Anything about it stick out in your mind? 11 Q. 12 Α. No. 13 Q. All right. The next flight that -- do you 14 remember a female name Kelly Bovina? A. I remember the name, but I don't remember 15 her. 16 17 Q. Was she an actress as well, do you 18 remember that? A. I don't recall. 19 The next flight I want to direct your 20 attention is 1501, May 3rd, 2001. 21 22 Α. Okay. 23 Q. What is that airport, ADS? 24 Α. Addison, Texas. San Antonio, Texas. 25 Q. And who are the passengers on that?



Page 131 DAVID RODGERS 1 2 Jeffrey Epstein, Virginia Roberts. 3 Q. Do you know how Virginia Roberts got to Addison, Texas? 5 Α. No. 6 Was that flight -- was the purpose of that Ο. 7 flight only to pick up Virginia Roberts? MR. PAGLIUCA: Object to form and R 9 foundation. BY MR. EDWARDS: 10 Can you tell by your logs? 11 Q. 12 Α. Not really. Let's see. We -- no, I don't 13 know. 14 Q. The flight previous on the 3rd flies in 15 from where? Where is that? A. Little Rock. 16 17 O. Arkansas? 18 A. Correct. 19 So the only passenger on that flight from Little Rock, Arkansas, to Addison, Texas, flight 20 21 1500, is Jeffrey Epstein, right? 22 A. Right. 23 And then you land in Addison before going to Santa Fe? 24 25 That is actually San Antonio, I believe. Α.



Page 132 DAVID RODGERS 1 Yes. That is San Antonio, SAT. 2 3 How long is the flight from Addison to San Antonio? 5 Α. I would be guessing, probably an hour. 6 Do you know what the purpose was for Ο. 7 landing --Well, you know, I can tell you. It is 8 Α. 9/10s. Fifty-four minutes. 9 10 Do you know what the purpose was to be to land in Addison, Texas, before arriving in San 11 Antonio? 12 13 A. I do not. But it appears that we spent 14 the night in San -- oh, I see what you are saying. No, I don't know. That I went to Addison probably 15 the same day. 16 17 Went to Addison and picked up Virginia Ο. 18 Roberts? A. It looks like it. 19 Q. And then in San Antonio, two days later, 20 who are your passengers on that flight, 1502? 21 22 Jeffrey Epstein, Virginia Roberts. 23 Where do you fly? From San Antonio to Palm Beach. 24 Α. 25 Q. And in May, on May 14th, 2001, flight



Page 133 DAVID RODGERS 1 1506, where is that flight leaving from? 2 3 St. Thomas. Ο. And going where? 5 Α. Teterboro. And who are your passengers? 6 Ο. 7 Jeffrey Epstein, Ghislaine Maxwell, Emmy Α. Tayler, Banu, Virginia Roberts and one female. 8 And, again, do you remember who the one 9 female would have been with Virginia Roberts? 10 No. 11 Α. Can you tell by this how any of those 12 13 individuals that were on that flight leaving from the Virgin Islands to Teterboro got to the Virgin 14 15 Islands? Α. No. 16 17 What were the other possible avenues back in those days for Jeffrey Epstein, Ghislaine Maxwell 18 to travel to the Virgin Islands? 19 They could have done a charter, possibly. 20 Α. Okay. Was there ever a time when, it 21 22 looks like that is the -- that is the Gulfstream 23 that you fly out of the Virgin Islands to Teterboro, correct? 24 25 Α. Correct.



Page 134 DAVID RODGERS 1 2 Q. Was there ever a time you were flying the 3 Gulfstream and -- well, let's go back a little bit. Okay. 5 Q. On May 7th, at the top. 6 Α. Right. 7 Flight 1503, that is the Gulfstream Q. traveling from Palm Beach to CHO? 8 9 Α. That is Charlottesville, I believe, Virginia. 10 And then on that same day from 11 0. Charlottesville to Teterboro? 12 13 A. Correct. 14 So when does the Gulfstream get from 15 Teterboro to St. Thomas? A. Hmm, I don't know. Because it appears 16 17 that I'm on vacation at that time. So I don't know. Q. How did you get to St. Thomas for the 14th 18 to fly? 19 A. Airline. 20 Q. All right. So at some point in time, 21 between May 7th and May 14th --22 A. Uh-huh. 23 24 -- somebody flies the Gulfstream to the Q. 25 Virgin Islands.



| | Page 135 |
|----|--|
| 1 | DAVID RODGERS |
| 2 | A. Correct. |
| 3 | Q. And who would that be? |
| 4 | MR. PAGLIUCA: Object to foundation. |
| 5 | THE WITNESS: Larry Visoski and I don't |
| 6 | know who the other person would have been. |
| 7 | BY MR. EDWARDS: |
| 8 | Q. When you pick up passengers in the Virgin |
| 9 | Islands and you are taking them to Teterboro, do you |
| 10 | speak with Larry Visoski about when he arrived in |
| 11 | the Virgin Islands? |
| 12 | A. Yeah. Yeah. We would coordinate that. I |
| 13 | mean, usually we would go down there together. We |
| 14 | would ride in the same airline down. |
| 15 | Q. In this particular case, you were on |
| 16 | vacation? |
| 17 | A. Well, that is true. However, most likely |
| 18 | he airlined home once he got to St. Thomas. And |
| 19 | then most likely, we drove in a car to Miami and |
| 20 | road the same airline down there. |
| 21 | Q. That was something that you customarily |
| 22 | did? |
| 23 | A. Yes. |
| 24 | Q. Okay. So then you have we have no way |
| 25 | of knowing then who the passengers that flew to the |
| | |



Page 136 DAVID RODGERS 1 Virgin Islands would have been, if there were any in 2 3 addition to those that left? Α. No. 5 Q. All right. You fly into Teterboro on flight 1506 on May 14th, 2001, and fly out in the 6 Gulfstream on the 24th, 10 days later; is that 7 right? 8 9 Α. Yes. 10 And your passengers, 10 days later flying to Palm Beach are Jeffrey Epstein, Ghislaine 11 Maxwell, Emmy Tayler, Adam Perry Lang and a female. 12 13 A. Right. 14 Do you know where Virginia Roberts went 15 during that time after she landed in Teterboro on the 14th? 16 I do not. Page 47, I'm going to go to flight 18 No. 1510. June 3rd, 2001. 19 Who is on that flight? 20 Jeffrey Epstein, Virginia Roberts, Banu. 21 Α. 22 And you are flying from Palm Beach to 23 St. Thomas again? 24 Α. St. Thomas, yes. 25 Q. And then from St. Thomas to Teterboro two



Page 137 DAVID RODGERS 1 days later, on June 5th? 2 3 Jeffrey Epstein, Virginia Roberts, and Banu. 5 Q. All right. And then where is the next 6 flight on the 8th? 7 On the 8th, from Teterboro to Montreal. Do you know what -- so Virginia Roberts 8 and Banu were not on the flight on the 8th, right? 9 10 Α. That's correct. Okay. Do you remember the flight on the 11 8th with Naomi Campbell, Rebecca White, Ana Malova? 12 13 A. Sort of. But not really. 14 Q. Okay. Do you remember who Rebecca White 15 is? No. 16 Α. 17 Do you remember how old Rebecca White was? Q. 18 No. Α. The next flight I want to direct your 19 attention to is on the 15th of June, flight 1516. 20 A. Uh-huh. 21 22 Passengers: Jeffrey Epstein, Ghislaine 23 Maxwell, and then does that say Sheridan? 24 Yes. Α. 25 Do you remember a passenger named Sheridan



Q.

Page 138 1 DAVID RODGERS 2 Gibson? Α. Possibly. 4 And then it says, Caroline. Do you know Q. who Caroline is? 5 6 Α. I do not. 7 And then one female? Yeah, I don't know who the female is. 8 Α. 9 Q. Okay. On the 28th, there is a flight 10 1523. Uh-huh. 11 Α. 12 From -- is that Portugal to St. Thomas? Q. No. It is the Azores. 13 Α. 14 LPAZ? Ο. 15 A. Yes. It was a fuel stop. 16 Ο. To St. Thomas? 17 Right. Α. 18 And then on that flight is Jeffrey Epstein, Ghislaine Maxwell, Emmy Tayler and Ed 19 Tuttle, right? 20 21 Α. Yes. 22 Six days later, leaving on July 4th from 23 St. Thomas, who are your passengers? Jeffrey Epstein, Prince Andrew, Virginia 24 Α. Roberts, one female. 25



Page 139 DAVID RODGERS 1 2 And do you know how Virginia Roberts got to the Virgin Islands? No. 5 Q. Is there any -- is it possible that the Cessna took her or the Boeing took her? Or any 6 other aircraft that is owned by Jeffrey? 7 8 MR. PAGLIUCA: Object to foundation. 9 THE WITNESS: No, I would -- if I had to 10 guess, I would guess the airlines. BY MR. EDWARDS: 11 12 Q. Okay. 13 Well, I know it wasn't the Boeing, because 14 the Boeing is not in operation at that point in time. We hadn't flown it. I mean, it hadn't had 15 any passengers on board yet. That is like in August 16 of 2001. 17 Okay. And the Cessna, did you take that 18 from Florida to the Virgin Islands? 19 It has been to the Virgin Islands, but I 20 don't think we ever took any passengers down there. 21 22 Q. Okay. All right. The next flight is 23 1525. Okay. 24 Α. 25 Q. On July 8th, 2001.



| | Page 140 |
|----|---|
| 1 | DAVID RODGERS |
| 2 | A. Okay. |
| 3 | Q. That leaves out of Palm Beach? |
| 4 | A. Okay. |
| 5 | Q. Where do you go on that? |
| 6 | A. Teterboro. |
| 7 | Q. And who are your passengers? |
| 8 | A. Jeffrey Epstein, Ghislaine Maxwell, Emmy |
| 9 | Tayler, Prince Andrew, Virginia Roberts, Sheridan |
| 10 | Gibson, maybe Sheridan Gibson-Beaute, I guess, and |
| 11 | one female. |
| 12 | Q. And then three days later, you leave out |
| 13 | of Teterboro to CPS? |
| 14 | A. Yes. |
| 15 | Q. Where is that? |
| 16 | A. That is St. Louis, actually it is Cahokia, |
| 17 | Illinois, across the river from St. Louis. |
| 18 | Q. Who are your passengers? |
| 19 | A. Jeffrey Epstein, Ghislaine Maxwell, Emmy |
| 20 | Tayler, Virginia Roberts. We were actually en route |
| 21 | to Santa Fe. We had a mechanical problem. We had |
| 22 | to go into there for maintenance. |
| 23 | Q. Do you remember having a mechanical |
| 24 | problem or is the log just refreshing your memory? |
| 25 | A. No, I remember because that was the only |



Page 141 DAVID RODGERS 1 2 time we landed at Cahokia with passengers on board. 3 Q. What was the problem? 4 We had a -- we had a static line that had 5 cracked and it was causing our altimeters to not agree. And then we went to the alternate system, 6 7 things got really worse because it was stopped up with a mud dauber somewhere in the system. That is 8 why I remember that flight. 9 10 When you landed in St. Louis did the passengers get off the plane? 11 Yes. And then they airlined -- I believe 12 Α. 13 they airlined. They could have taken a charter, I 14 don't recall. But I know they didn't leave with us. Q. All right. And the passengers that got 15 off the plane would have been Jeffrey Epstein, 16 Ghislaine Maxwell, Emmy Tayler and Virginia Roberts? 17 18 Α. Yes. And then on the 16th, those five days 19 later, those same passengers leave Santa Fe? 20 21 Α. Right. 22 And go back to Teterboro? 23 Α. Correct. When Jeffrey Epstein would go to his 24 25 townhouse in New York, would you always fly into



Page 142

- 1 DAVID RODGERS
- 2 Teterboro?
- 3 A. Most of the time. It would depend on the
- 4 airplane, too. Like the Boeing, you are not allowed
- 5 to take it into Teterboro.
- 6 Q. So while you had the Gulfstream, it seemed
- 7 like Teterboro?
- 8 A. Yeah, it is -- I mean, occasionally there
- 9 would be a LaGuardia in there, but not really often.
- 10 Q. So on the 16th, you fly in to Teterboro.
- 11 And then six days later, it looks like, flight
- 12 No. 15 -- oh, wait. All right.
- So flight No. 1528, you fly into
- 14 Teterboro, Jeffrey Epstein, Emmy Tayler, Ghislaine
- 15 Maxwell and Virginia Roberts. Do you see that?
- 16 A. Yes.
- 17 Q. Then the next flight I have listed is
- 18 1530.
- Do you know where 1529 is?
- 20 A. No, other than I'm gone for some reason.
- 21 I wasn't on that flight.
- 22 Let's see. July, approximately. I see I
- 23 went on vacation.
- Q. Okay. And the 23rd, there is a flight
- 25 from Palm Beach to St. Thomas with Jeffrey Epstein,



Page 143 DAVID RODGERS 1 2 Shelly Lewis. Do you see that? 3 Α. Yes. Five days later, the flight that leaves 5 St. Thomas does not have Shelly Lewis; is that 6 right? 7 Correct. Α. And then you fly to Palm Beach? R Ο. 9 Α. Yes. 10 Ο. And who are your passengers at that time? Jeffrey Epstein, Virginia Roberts, yes. 11 Α. When you had the mechanical problem, do 12 13 you remember any of the passengers being scared or 14 frightened? No. Not really. I mean, they didn't 15 really know that we had a problem. We just informed 16 17 them that we couldn't continue on to Santa Fe. 18 Q. Okay. And August 7th, 2001, flight 2? Uh-huh. 19 Α. Is that the first flight that the Boeing 20 makes with passengers? 21 22 Α. Correct. 23 And that is Jeffrey Epstein, Ghislaine Maxwell, Emmy Tayler, Prince Andrew and two females. 24 25 Do you remember who the two females were on the



Page 144 DAVID RODGERS 1 first passenger flight of the Boeing? 2 3 I do not. And then on the 7th -- at that flight flew Ο. 5 from Los Angeles to Albuquerque, correct? 6 Α. Uh-huh. 7 On the 14th, you were flying the Cessna Ο. that has the 908GM tag. 8 9 Correct. Right. Α. 10 And then the next entry with passengers is on the 16th. And you are flying the Boeing again, 11 right? 12 13 Α. Yes. 14 Q. All right. Do you know who flew the Boeing for flight 3, 4 and 5? 15 A. For 3, 4 and 5, no. Oh, yes. I know it 16 17 wasn't me. I do remember that now. I went on vacation. And it was a contract 18 19 guy that flew for us while I was gone. Q. Do you remember a passenger named 20 Alexander Dixon? 21 22 A. Alexander Dixon, no. 23 Q. Flight No. 11 on the Boeing? 24 Uh-huh. Α. 25 Q. Now, the Boeing has the tag 908JE?



Page 145 DAVID RODGERS 1 2 Α. Correct. 3 Q. That is what you were explaining in the beginning, correct? 5 Α. Correct. 6 So September 3rd, the Boeing flies from Ο. 7 St. Thomas to HPN? Yes, White Plains, New York. R Α. 9 And your passengers? Jeffrey Epstein, Ghislaine Maxwell, Emmy 10 Tayler, Adam Perry Lane, Banu, Sarah Kellen, 11 Alexander Dixon. 12 13 Q. Do you remember Sarah Kellen? 14 Α. Yes. 15 And do you remember what -- is that your first time meeting Sarah Kellen, when she appears? 16 A. I don't think so. I thought she was on an earlier flight. Let's see. But it could be. 18 could be, I'm not sure. 19 Q. Do you know how Sarah Kellen got to 20 St. Thomas to be leaving St. Thomas with you? 21 22 Α. No. Do you know what her relationship was, if 23 any, with Jeffrey Epstein? 24 25 Α. She was -- Sarah was sort of taking over



Page 146 DAVID RODGERS 1 2 Emmy's position. Like an assistant to Ghislaine. All right. Page 53. January 15th, 2002. 3 Q. Okay. 5 There is a flight from Bedford, 6 Massachusetts; is that right? 7 Yes. Α. To where is that going? R Ο. 9 White Plains. Α. And it's Jeffrey Epstein and Jessica. 10 Q. Yes. 11 Α. Do you remember who Jessica is? 12 Q. 13 Α. I do not. 14 Q. From White Plains, who are the passengers 15 going to St. Thomas? Jeffrey Epstein, Ghislaine Maxwell, Sarah 16 Kellen, Prince Andrew, Cindy Lopez, Johanna and one 17 18 female. Do you remember Cindy Lopez? 19 Q. 20 A. Yes. And what did she do? 21 Q. 22 I don't know what she did, but I do 23 remember Cindy Lopez. 24 Was she somebody that you believed to be a Q. 25 masseuse?



| | Page 147 | |
|----|---|--|
| 1 | DAVID RODGERS | |
| 2 | A. I'm not sure what her position was. It is | |
| 3 | possible. | |
| 4 | Q. All right. February 9th, 2002, flight 57 | |
| 5 | on the Boeing. | |
| 6 | A. Okay. | |
| 7 | Q. From Miami to White Plains. | |
| 8 | A. Yes. | |
| 9 | Q. Your passengers include Bill Clinton, four | |
| 10 | Secret Service. | |
| 11 | Did the Secret Service ask that you not | |
| 12 | identify them by name? | |
| 13 | A. No. | |
| 14 | Q. Any reason that you didn't identify them | |
| 15 | by name? | |
| 16 | A. Didn't know their name. | |
| 17 | Q. Two males, one female. | |
| 18 | A. Right. | |
| 19 | Q. Jeffrey Epstein, Ghislaine Maxwell, Sarah | |
| 20 | Kellen and Prince Andrew. | |
| 21 | A. Correct. | |
| 22 | Q. Was that your first time meeting Bill | |
| 23 | Clinton? | |
| 24 | A. Yes. | |
| 25 | Q. At that point, did you have any | |



Page 148

- 1 DAVID RODGERS
- 2 understanding of what was the relationship between
- 3 Jeffrey Epstein and Bill Clinton or Ghislaine
- 4 Maxwell and Bill Clinton?
- 5 A. No, I didn't have any idea.
- 6 Q. Had you seen any pictures, prior to that
- 7 time, of Bill Clinton in any of Jeffrey Epstein's
- 8 planes or homes?
- 9 A. Not him I'm aware of.
- 10 Q. Have you ever seen a picture of Bill
- 11 Clinton in Jeffrey Epstein's plane?
- 12 A. In his plane? I don't think so.
- Q. Have you ever seen one in his homes?
- 14 A. Not that I can recall.
- 15 Q. Okay.
- 16 A. Oh, wait, wait. Back up. A picture of
- 17 Bill Clinton in the plane? Do you mean the picture
- 18 is on the wall in the airplane or a picture taken of
- 19 Bill Clinton on the plane?
- Q. A picture of Bill Clinton on the wall of
- 21 the airplane.
- 22 A. I have a picture of me and actually the
- 23 crew with Bill Clinton on the plane, but it is not
- 24 on the wall of the airplane.
- Q. And when was the picture of you with Bill



Page 149 DAVID RODGERS 1 Clinton taken? 2 3 Α. I think it was the first flight. Ο. The flight that we just looked at? 5 Α. Yes. 6 To the best of your knowledge, is that the Ο. 7 first time that Bill Clinton flew with Jeffrey Epstein or Ghislaine Maxwell? 8 9 To the best of my knowledge. It was the Α. first time that we had flown him. 10 Okay. On flight No. 72, which is page 54, 11 Ο. March 10th. 12 13 Α. Okay. 14 The Boeing flies from St. Thomas to JFK; 15 is that right? Yes. 16 Α. 17 Is there any way of knowing when the Boeing got to St. Thomas by these logs? 18 A. Yes, it got there on the 28th. Because it 19 is trip No. 71 above it. Oh, wait. Oh. Wait. 20 State the question again. 21 22 Q. Yes, exactly. 23 Do we know how or when the Boeing got to St. Thomas? It is leaving out of St. Thomas on 24 25 flight 72, but flight 71 seems to me to land in Palm



Page 150 DAVID RODGERS 1 2 Beach. 3 Correct. So I'm just missing the kind of connection Ο. 5 there. 6 Α. Yes. Me, too. 7 Q. Okay. Yeah, I don't have an answer for that. R Α. 9 Okay. Would somebody else have flown the Boeing, while you were doing this simulator, the 6th 10 and 7th and 8th? 11 It is possible. 12 Α. 13 Q. That is one possible conclusion, based 14 upon what we have here? 15 That is probably what happened. Okay. 16 O . 17 So then March 10th -- sorry. March 10th, 18 you fly to JFK, right? A. Yes. 19 March 4th, from JFK to Palm Beach. March 20 the 17th, from Palm Beach back to JFK. And then 21 March 19th, 2002, you fly from JFK to -- where is 22 23 that? 24 Luton, London. Α. 25 Q. And who are your passengers?



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- 1 DAVID RODGERS
- 2 A. Bill Clinton. Doug Band. Three Secret
- 3 Service, Jeffrey Epstein, Ghislaine Maxwell, Sarah
- 4 Kellen.
- Q. And the next day -- or, sorry, two days
- 6 later.
- 7 Do you know where those passengers stayed
- 8 in London?
- 9 A. I have to think about this one second.
- 10 No, in fact, I don't think they did. Because we
- 11 didn't spend the night there. We went there. I got
- 12 to the hotel. As soon as I got to the hotel, I got
- 13 word from Secret Service that President Clinton
- 14 wanted to leave that night, so we left that night.
- 15 So we made it to the hotel, the crew did,
- 16 but we were there not that long. Two or three
- 17 hours, four hours, maybe.
- Q. Do you remember why he wanted to leave
- 19 that night?
- 20 A. No. No, because when we went there, we
- 21 thought we were going to be there for like probably
- 22 at least a couple of nights. But it didn't turn
- 23 out -- we didn't even spend one night there.
- Q. Okay. So does this probably mean that you
- 25 got there late at night on the 19th, the early



Page 152 DAVID RODGERS 1 morning on the 21st? 2 3 A. We took off the 19th. So when we land there, it is really the 20th. And probably when we 5 took off there, it is like after midnight or 6 thereabouts. 7 And that is when you fly back to JFK? Q. Back to JFK, yes. R Α. 9 And you went there with three Secret Service and came back with 10? 10 Α. Yes. 11 How did that happen? 12 Ο. 13 Well, there was an advance party waiting 14 for us when we got there and then when we came back, they just flew back with us. 15

- Q. What was the events that you were
- 17 traveling to London for?
- 18 A. I'm not sure. I would imagine, he was
- 19 probably giving a speech.
- 20 Q. Okay. And you came back with Bill
- 21 Clinton, Doug Band?
- 22 A. Yes.
- Q. Who was Doug Band?
- A. Doug was Bill Clinton's, he's an attorney,
- 25 and he was like his right-hand guy, really, as far



Page 153 DAVID RODGERS 1 as doing anything. 2 3 Q. Okay. And you also flew back with Jeffrey Epstein, Ghislaine Maxwell, Sarah Kellen and Naomi 5 Campbell? 6 Α. Yes. 7 How did it happen that Naomi Campbell Q. joined the plane to come home? 8 9 A. I don't know. The same way she joined it before I guess in Montreal. I don't know how she 10 was there. And one male, too. It looks like. 11 Q. All right. The next page is page 56, 12 13 flight 96. 14 A. Okay. 15 Q. Sorry. Let's back up to 94. When the Boeing takes off from JFK, do you 16 know sometime during that trip that you are going to 17 be picking up President Clinton? 18 A. I think so. Let me see. We went to 19 Paris. 20 Yes, oh, yes. We knew that was going to 21 22 be a long trip. 23 Q. Okay. 24 So we knew at that point in time. I'm



almost certain that we knew.

25

Page 154 DAVID RODGERS 1 2 What did you know about that trip? 3 We knew that was going to be a long trip because we were going to go around the world. 5 So when we departed, it was a about a week later, as I recall, that we picked up Clinton. We 6 left JFK on the 11th, a little less than a week. 7 Half a week later, we picked up Clinton and from 8 there, we went to -- Hong Kong. 9 10 Q. So you fly in to -- on the 20th, flight 99, Jeffrey Epstein, Ghislaine Maxwell, and Sarah 11 Kellen. 12 13 A. Right. 14 You fly in to a Naval air base in Japan? 15 A. Correct. O. How were you given access to stay in the 16 17 Naval air base? MR. PAGLIUCA: Object to foundation. 18 THE WITNESS: The airplane, you mean? 19 BY MR. EDWARDS: 20 Yes. It looks like it is there two days. 21 Q. 22 That is why --23 I guess because we were picking up President Clinton. 24 25 And do you know where Jeffrey Epstein, Q.



Page 155 DAVID RODGERS 1 Ghislaine Maxwell and Sarah Kellen stayed? 2 3 I do not. Ο. Was there a room for them on the Naval air 5 base? 6 No, I don't think -- nobody stayed at the 7 Naval air base. All right. And then on the 22nd, you 8 Ο. 9 leave the Naval air base with -- who is that on that flight? 10 Jeffrey Epstein, Ghislaine Maxwell, Sarah 11 Kellen, President Bill Clinton, Mike, Doug Band, 12 13 Janis and Jessica. 14 Q. You flew into the Naval air base with 15 Jeffrey Epstein? Plus six other passengers. 16 17 Okay. Are those secret service? Ο. 18 Most likely. O. You flew in to the Naval air base with 19 Jeffrey Epstein, Ghislaine Maxwell and Sarah Kellen 20 only, right? 21 22 A. Right. 23 And nobody stayed on the Naval air base? 24 No. Α. 25 Q. And you are there to pick up Bill Clinton?



Page 156 DAVID RODGERS 1 2 Α. Yes. 3 Q. And you pick up Bill Clinton and six passengers plus Mike? 5 Α. Correct. 6 Doug Band, who you have already explained 7 who that is with relation to Bill Clinton, and Janis and Jessica. 8 9 Α. Yes. 10 Do you know who they are? Yes. 11 Α. Who are Janis and Jessica? 12 Ο. 13 Α. Secret Service. 14 Q. How do you remember that? 15 Well, there is probably 8, 8 or 9 Secret Α. Service people there, two of them were women. 16 17 other 7 -- and it was just easier to remember the two women's names than the 7 other guys' names. 18 This entry on January 22nd, 2002, Jessica, 19 0. 20 is that the same or a different Jessica from --On which one? 21 Α. 22 Sure. Sorry. May 22nd. I think I 23 butchered the date before. Right. 24 Α. 25 Q. May 22nd, 2002. Is that the same Jessica



Page 157 DAVID RODGERS 1 as January 15th, 2002, flying with Jeffrey Epstein? 2 3 January 15th. MR. REINHART: Flight 48. 5 BY MR. EDWARDS: 6 Right. It is flight 48. Ο. 7 I'm don't think -- no, I they wouldn't be the same Jessica, no. 8 9 Okay. After you pick up President Bill Q. 10 Clinton, where did you fly? We went to Hong Kong. 11 Α. 12 Q. Do you know what the purpose was? 13 Α. I believe he was giving a speech. 14 Q. All right. And then from there, where did you fly? 15 That would be Shenzhen, Japan -- or China. 16 Α. Okay. And do you remember the purpose 18 there? A. Speech. 19 Q. And then where did you fly? 20 A. Singapore. 21 22 Q. Again, another speech? 23 Α. Another speech. During the course of these days, where did 24 25 President Bill Clinton sleep?



Page 158 DAVID RODGERS 1 2 Α. I guess at a hotel somewhere. I'm not 3 sure. 4 Did he stay at the same place as Jeffrey Ο. Epstein, Ghislaine Maxwell and Sarah Kellen? 5 MR. PAGLIUCA: Foundation. 6 7 THE WITNESS: I don't know. BY MR. EDWARDS: 9 Ο. All right. Were meals served on the 10 plane? A. Something was served, but I don't know if 11 12 you would call it a meal. Probably. I'm sure we had catering and stuff. I just don't recall. 13 Q. That was just typical back then to have 14 meals, especially for the President, right? 15 16 Normally we do not. And we probably did have catering back then, but I don't recall. 17 Okay. Where did you fly from Singapore? 18 Singapore, VTBD, I don't know. You have 19 your cheat sheet over there? 20 21 Q. VTBD, mine says Thailand. 22 I was going to guess Thailand. Α. Then from Thailand, I think we went to --23 2.4 My cheat sheet says Brunei? Ο. 25 Exactly. You don't want to go there. Α.



| | Page 159 |
|----|---|
| 1 | DAVID RODGERS |
| 2 | Q. You don't? |
| 3 | A. No. |
| 4 | Q. Okay. Was the purpose a speech at each |
| 5 | location to the best of your knowledge? |
| 6 | A. To the best of my knowledge, it was. |
| 7 | Q. All right. Do you know why it was that |
| 8 | Jeffrey Epstein and Ghislaine Maxwell and Sarah |
| 9 | Kellen accompanied him? |
| 10 | A. No. |
| 11 | Q. And then did you leave? |
| 12 | MR. REINHART: Did you answer that |
| 13 | question? |
| 14 | THE REPORTER: He said no. |
| 15 | MR. REINHART: I didn't hear it. |
| 16 | BY MR. EDWARDS: |
| 17 | Q. Did you leave President Bill Clinton and |
| 18 | Doug Band and the Secret Service in Brunei? |
| 19 | A. Hmm. It is possible. |
| 20 | What is WRR? |
| 21 | Q. Not found. Sorry. |
| 22 | A. Not good. |
| 23 | Q. That is the only entry in here that is not |
| 24 | found. |
| 25 | But the next one, VCBI says Sri Lanka? |



| | Page 160 |
|----|---|
| 1 | DAVID RODGERS |
| 2 | A. Okay. Then if that says Sri Lanka, then, |
| 3 | yes, we probably did leave Clinton in Brunei, I |
| 4 | think. And I think we went from there down to Bali. |
| 5 | We went to Bali without |
| 6 | Q. Without Bill Clinton? |
| 7 | A. Yes. |
| 8 | Q. What was the purpose of the trip to Bali? |
| 9 | A. Just to get away. |
| 10 | Q. And then to Sri Lanka? |
| 11 | A. Sri Lanka was just a fuel stop on the way |
| 12 | to Paris. Two fuel stops. |
| 13 | Q. That's in Dubai? |
| 14 | A. Yes. |
| 15 | Q. And then you get to Paris? |
| 16 | A. Correct. |
| 17 | Q. And then you fly back to London? |
| 18 | A. Yes. Yes. |
| 19 | Q. All right. Do you remember the purpose of |
| 20 | the trip to London? |
| 21 | A. Yes. |
| 22 | Q. What was that? |
| 23 | A. We had to have our APU changed on the |
| 24 | airplane. It quit working in Paris. And we landed |
| 25 | there. |



Page 161 DAVID RODGERS 1 Q. All right. The next page, page 57, 2 June 21st. Flight 1570. Where is that flight 3 leaving from? 5 Palm Beach to the Bahamas. 6 And who is on the flight from Palm Beach Ο. 7 to the Bahamas? Jeffrey Epstein, Ghislaine Maxwell, Sarah 8 Α. 9 Kellen, Cindy Lopez, Jean-Luc Brunel, Virginia 10 Roberts. All right. And that is on June 21st? 11 Q. 12 Α. Yes. 13 Q. All right. And then there is a couple of 14 entries that say "reposition." 15 A. Right. That is flying back to Palm Beach and then 16 17 back down to the Bahamas? A. Correct. Yeah, we left them there. And 18 we flew the airplane home. 19 Q. And then did you leave out of the Bahamas 20 on the 23rd. 21 22 A. Yes. 23 Q. Up to Teterboro. 24 And who are your passengers on flight



25

1573?

| | | Page 162 |
|----|-----------|---|
| 1 | | DAVID RODGERS |
| 2 | А. | Jeffrey Epstein, Ghislaine Maxwell, Sarah |
| 3 | Kellen, C | indy Lopez, Juliana Borres, I guess, |
| 4 | Jean-Luc | Brunel, Melissa Stahl. |
| 5 | Q. | A Virginia Roberts was taken to the |
| 6 | Bahamas. | Do you know where she went from there? |
| 7 | А. | I do not. |
| 8 | Q. | Do you remember a Frederic Fekkai? |
| 9 | А. | What is the name again? |
| 10 | Q. | Fekkai, F-E-K-K-A-I. Frederic Fekkai? |
| 11 | А. | First name? |
| 12 | Q. | Fred. |
| 13 | А. | Fred. |
| 14 | Q. | Hairdresser? |
| 15 | А. | The last name sounds familiar. |
| 16 | Q. | All right. He's on a flight No. 116 on |
| 17 | the Boein | g. |
| 18 | А. | Uh-huh. |
| 19 | Q. | June 27th? |
| 20 | А. | Okay. I see. |
| 21 | Q. | And there are it looks like a bunch of |
| 22 | passenger | s. Do you remember Daralyn Priest? |
| 23 | А. | No. Where is she? |
| 24 | Q. | Middle column. |
| 25 | А. | Daralyn. Oh, yes, I see her. Right. I |
| | | |



Page 163 DAVID RODGERS 1 don't remember her. 2 3 Q. Do you remember that flight? To Paris. Not really. It was a big 5 We had a lot of people on it, which was 6 unusual, going to Paris. No, I don't. 7 You don't remember it. Q. No. R Α. 9 So you don't remember the purpose of the flight? 10 Α. No. 11 July 2002, it is page 58. Go to flight 12 Q. 13 120. 14 Α. Okay. 15 Q. LF? 16 A. That is Nice. 17 Q. And where do you go? 18 Tangiers. Α. And then from Tangiers to? 19 Q. 20 To another place in Morocco. Marrakesh. I think it is Marrakesh. I could be wrong on that 21 22 one. It is definitely Morocco. 23 From there, is that where you pick up Bill 24 Clinton? 25 Α. Let's see. GMME would be Rabat, the



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DAVID RODGERS 1 capital of Morocco, I believe. 2 3 Q. Did you know before this flight that you at some point would be picking up Bill Clinton? 5 Α. I think we did, yes. Who was on the flight with Bill Clinton? 6 Q. 7 Jeffrey Epstein, Ghislaine Maxwell, Sarah Α. Kellen, Prince Andrew, Cindy Lopez, President 8 Clinton, Doug Band, Mike, with Secret Service and 8 9 10 Secret Service people. So probably 9 Secret Service people. 11 12 Q. So Mike is a person that is also -- that

- 14 A. He's Secret Service, yes. That is just
- 15 what I recall. He was the lead guy of the Secret
- 16 Service.

is?

13

- 17 Q. Where do you take Bill Clinton?
- 18 A. We went to the Azores for a fuel stop and
- 19 then we went to JFK. Kennedy, New York.
- Q. Then on August 5th, in the Gulfstream, on
- 21 flight 1586, you leave from Teterboro and go to
- 22 Santa Fe; is that correct?
- A. Correct.
- Q. On that flight, you have Jeffrey
- 25 Epstein -- sorry, Jeffrey Epstein, Sarah Kellen and



Page 165 DAVID RODGERS 1 2 two females? 3 Α. Yes. Ο. Do you know who those two females were? 5 Α. No. 6 How long does the plane, the Gulfstream, Ο. 7 stay in Santa Fe? Let's see. 1586, Gulfstream. I don't 8 Α. 9 really know, because apparently, we had 1586 and the next one I see is 1589. So it flew three places, 10 but I wasn't on that trip. 11 1587 and 1588 are missing, right? 12 Q. 13 That is what I'm saying. 14 Q. Because you are not on it? 15 A. I'm not on the trip. Q. And 1589? 16 17 A. Uh-huh. 18 Q. Leaving out of Santa Fe, who are the 19 passengers? Jeffrey Epstein, Ghislaine Maxwell, Sarah 20 Kellen, Cindy Lopez, Virginia Roberts, Dan Moran, 21 22 Eduardo, Alfred, Margarita and Nick Simmons. 23 Do you know how Virginia Roberts got to Santa Fe? 24 25 Α. No.



Page 166 DAVID RODGERS 1 2 Q. Is there any way to get to Santa Fe from, say, Florida -- well, strike that. MR. PAGLIUCA: Bus, train, car. 5 BY MR. EDWARDS: 6 Ο. Did you ever know Virginia Roberts to take 7 a train? Not that I'm aware. R Α. 9 Did you ever know her to take a bus? 10 MR. REINHART: To go to New Mexico? THE WITNESS: Not that I'm aware. Maybe 11 she has, but I don't know about it. 12 13 BY MR. EDWARDS: 14 Q. Okay. I have a picture of her on horseback at the ranch, so who knows. 15 Let's see. August 17th, sorry, 16 17 August 18th. 18 A. Okay. Q. From Teterboro to Palm Beach? 19 20 A. Right. 21 Who are your passengers? 22 Jeffrey Epstein, Virginia Roberts, one 23 female. All right. Do you remember who that 24 Q. 25 female was?



```
Page 219
1
                          DAVID RODGERS
2
                      CERTIFICATE OF OATH
    STATE OF FLORIDA
3
    COUNTY OF MIAMI-DADE
5
                I, the undersigned authority, certify
       that DAVID RODGERS personally appeared before
6
       me and was duly sworn.
7
                WITNESS my hand and official seal
       this 8th day of June, 2016.
8
9
                     Kelli Ann Willis, RPR, CRR
                    Notary Public, State of Florida
10
                    Commission FF928291, Expires 2-16-20
                     + + + + + + + + + + + + +
11
                          CERTIFICATE
12
    STATE
                FLORIDA
13
           \cap F
    COUNTY OF MIAMI-DADE )
14
15
                I, Kelli Ann Willis, Registered
       Professional Reporter and Certified Realtime
       Reporter do hereby certify that
16
       authorized to and did stenographically report the
       foregoing deposition of DAVID RODGERS; that a
17
       review of the transcript was not requested; and
       that the transcript is
18
                                    a true record of my
       stenographic notes.
19
                I FURTHER CERTIFY that I am not a
       relative, employee, attorney, or counsel of
       of the parties, nor am I a relative or employee of
20
       any of the parties' attorney or counsel connected
21
       with the action, nor am I financially interested
       in the action.
22
                Dated this 8th day of June, 2016.
23
24
                         KELLI ANN WILLIS, RPR, CRR
25
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Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----x

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----x

May 18, 2016 9:04 a.m.

CONFIDENTIAL

Deposition of JOHANNA SJOBERG, pursuant to notice, taken by Plaintiff, at the offices of Boies Schiller & Flexner, 401
Las Olas Boulevard, Fort Lauderdale, Florida, before Kelli Ann Willis, a Registered
Professional Reporter, Certified Realtime
Reporter and Notary Public within and for the State of Florida.



Page 8

- 1 Q. Okay. Great.
- 2 All right. Do you know a female by the
- 3 name of Ghislaine Maxwell?
- 4 A. Yes.
- 5 Q. And when did you first meet Ms. Maxwell?
- 6 A. 2001. March probably. End of
- 7 February/beginning of March.
- 8 Q. And how did you meet her?
- 9 A. She approached me while I was on campus at
- 10 Palm Beach Atlantic College.
- 11 Q. And what happened when she approached you?
- 12 A. She asked me if I could tell her how to
- 13 find someone that would come and work at her house.
- 14 She wanted to know if there was, like, a bulletin
- 15 board or something that she could post, that she was
- 16 looking for someone to hire.
- 17 O. And what did you discuss with her?
- 18 A. I told her where she could go to -- you
- 19 know, to put up a listing. And then she asked me if
- 20 I knew anyone that would be interested in working
- 21 for her.
- Q. Did she describe what that work was going
- 23 to be?
- 24 A. She explained that she lived in Palm Beach
- and didn't want butlers because they're too stuffy.



- 1 And so she just liked to hire girls to work at the
- 2 house, answer phones, get drinks, do the job a
- 3 butler would do.
- 4 Q. And did she tell you what she would pay
- 5 for that kind of a job?
- A. At that moment, no, but later in the day,
- 7 yes.
- 8 Q. And what did she say?
- 9 A. Twenty dollars an hour.
- 10 Q. Was there anybody else with Ms. Maxwell
- 11 when you met her?
- 12 A. There was another woman with her. I don't
- 13 recall her or what she looks like or how old she
- 14 was.
- 15 O. And what happened next?
- 16 A. And then she asked me if I would be
- 17 interested in working for her. And she told me that
- 18 she was -- I could trust her and that I could jump
- 19 in her car and go check out the house at that moment
- 20 if I wanted.
- 21 And so I said, Sure, let's do it, and went
- 22 to her home with her.
- Q. And where was that home?
- 24 A. In Palm Beach.
- Q. And did she describe that home as being



- 1 magazines.
- 2 She and I went -- she wanted to take me
- 3 shopping to Worth Avenue, but it was a Sunday and
- 4 Nieman Marcus was closed, so we went back to, like,
- 5 a little book store. And I remember she bought, I
- 6 think, five pairs of reading glasses because she
- 7 thought Jeffrey would like them. He had them all
- 8 over the house. On every table there was reading
- 9 glasses.
- 10 And that's about it. It was a pretty
- 11 simple day.
- Q. Were you paid that day for that work?
- 13 A. Yes.
- Q. And how much were you paid? Do you
- 15 remember?
- 16 A. I don't remember how many hours I was
- 17 there -- I was there. She paid me cash.
- 18 Q. So Maxwell paid you?
- 19 A. Yes.
- 20 Q. And then was she the one who trained you
- 21 with what -- with respect to what you were supposed
- 22 to do during the day, directed you to, like you
- 23 said, go to --
- 24 A. I believe she was the one that was kind of
- 25 showing me around.



- 1 Q. And how long did you work in that position
- 2 answering phones and doing --
- 3 A. Just that one day.
- 4 Q. Just that one day.
- 5 And did your duties change?
- 6 A. Well, the next time she called me, she
- 7 asked me if I wanted to come over and make \$100 an
- 8 hour rubbing feet.
- 9 Q. And what did you think of that offer?
- 10 A. I thought it was fantastic.
- 11 Q. And did you come over to the house for
- 12 that purpose?
- 13 A. Yes.
- 14 Q. And when you came over to the house, was
- 15 Maxwell present?
- 16 A. I don't recall.
- 17 Q. And what happened that second time you
- 18 came to the house?
- 19 A. At that point, I met Emmy Taylor, and she
- took me up to Jeffrey's bathroom and he was present.
- 21 And her and I both massaged Jeffrey. She was
- 22 showing me how to massage.
- 23 And then she -- he took -- he got off the
- 24 table, she got on the table. She took off her
- 25 clothes, got on the table, and then he was showing



- 1 me moves that he liked. And then I took my clothes
- 2 off. They asked me to get on the table so I could
- 3 feel it. Then they both massaged me.
- 4 Q. So it was more than a foot massage at that
- 5 point?
- 6 A. Yeah, it was mostly, like, legs and back.
- 7 Q. Was everybody in the room without clothes
- 8 on?
- 9 A. When they were on the massage table, yes.
- 10 Q. Did they -- when they got off the massage
- 11 table to perform the massage, did they dress or
- 12 did --
- 13 A. Yes.
- 14 Q. They dressed.
- 15 And do you recall who paid you for that
- 16 first day that you did the massages?
- 17 A. I don't recall.
- 18 Q. Do you recall whether Maxwell was at the
- 19 house during that first day when you were doing the
- 20 massage with Emmy and Jeffrey?
- 21 MS. MENNINGER: Objection, asked and
- answered.
- 23 BY MS. McCAWLEY:
- Q. You can answer.
- 25 A. I don't recall.



| | Page 15 |
|----|--|
| 1 | Q. Who did Emmy work for? |
| 2 | A. Ghislaine. |
| 3 | Q. Did Maxwell ever refer to Emmy by any |
| 4 | particular term? |
| 5 | A. She called her her slave. |
| 6 | Q. You said your job duties changed. Did you |
| 7 | start to travel as part of your job with Jeffrey and |
| 8 | Ghislaine? |
| 9 | A. Yes. The next time they called me, they |
| 10 | asked me to go to New York. |
| 11 | Q. And did you do you recall when that was |
| 12 | approximately? |
| 13 | A. That was Easter of 2001. |
| 14 | Q. And do you recall who was on the plane |
| 15 | with you for that trip? |
| 16 | MS. MENNINGER: Objection, leading, form. |
| 17 | MS. McCAWLEY: Actually, I'm going to stop |
| 18 | really quickly and I'm going to ask for the |
| 19 | next exhibit, please. |
| 20 | MS. MENNINGER: This is 3? |
| 21 | MS. McCAWLEY: Yes. I'm going to mark |
| 22 | this as Exhibit 3 for purposes of the |
| 23 | deposition. |
| 24 | |
| 25 | |



Page 27 leading. 1 THE WITNESS: Jeffrey Epstein; Ghislaine 2 Maxwell; AP and PK are the two women I do not 3 recall; Virginia Roberts; and myself. 4 5 BY MS. McCAWLEY: Do you recall how you flew back from the 6 7 location in the US Virgin Islands? They put me on a commercial flight. 8 wanted to be home in time for Easter. 9 10 When you say "they," do you recall who made those arrangements for you? 11 12 It could have been Ghislaine. Did you -- do you recall performing 13 Ο. massages while you were in the US Virgin Islands? 14 Α. Yes. 15 Who was involved in -- was there more than 16 Ο. 17 one? I massaged Ghislaine at one point. 18 Yes. And I massaged Jeffrey, Virginia and I, both, on the 19 20 beach. Were you dressed during the massage that 21 was on the beach? 22 Yes. Bikinis probably, most likely. 23 Α. Do you recall what Virginia was wearing? 24 0.



I believe she was wearing a bathing suit,

25

Α.

| | Page 32 | | | | | |
|----|--|--|--|--|--|--|
| 1 | to object and then you can still answer. No | | | | | |
| 2 | one is going to stop you from answering. I | | | | | |
| 3 | just need to get the objection on the record, | | | | | |
| 4 | in the same way she needs to be able to talk | | | | | |
| 5 | before you. My apologies. I'm not trying to | | | | | |
| 6 | cut you off, but I am supposed to get it in | | | | | |
| 7 | before you answer. | | | | | |
| 8 | BY MS. McCAWLEY: | | | | | |
| 9 | Q. Did Jeffrey ever tell you why he received | | | | | |
| 10 | so many massages from so many different girls? | | | | | |
| 11 | MS. MENNINGER: Objection, hearsay. | | | | | |
| 12 | BY MS. McCAWLEY: | | | | | |
| 13 | Q. You can answer. | | | | | |
| 14 | A. He explained to me that, in his opinion, | | | | | |
| 15 | he needed to have three orgasms a day. It was | | | | | |
| 16 | biological, like eating. | | | | | |
| 17 | Q. And what was your reaction to that | | | | | |
| 18 | statement? | | | | | |
| 19 | A. I thought it was a little crazy. | | | | | |
| 20 | Q. And what did do you recall what when | | | | | |
| 21 | you observed the other females giving massages, do | | | | | |
| 22 | you recall what they would dress like? Did they | | | | | |
| 23 | wear scrubs or did they typically wear normal | | | | | |
| 24 | clothes? | | | | | |
| 25 | Normal alothog | | | | | |



Page 33 MS. MENNINGER: Objection, leading. 1 BY MS. McCAWLEY: 2 Do you believe that from your 3 Ο. 4 observations, Maxwell and Epstein were boyfriend and 5 girlfriend? 6 Initially, yes. Α. 7 Did Maxwell ever share with you whether it Ο. bothered her that Jeffrey had so many girls around? 8 9 MS. MENNINGER: Objection, leading, 10 hearsay. THE WITNESS: No. Actually, the opposite. 11 BY MS. McCAWLEY: 12 What did she say? 13 O. She let me know that she was -- she would 14 Α. not be able to please him as much as he needed and 15 that is why there were other girls around. 16 17 Ο. Did there ever come a time -- did you ever take a photography class in school? 18 19 Α. Yes. And did there ever come a time when 20 Ο. Maxwell offered to buy you a camera? 21 22 Α. Yes. MS. MENNINGER: Objection, leading. 23 BY MS. McCAWLEY: 24



Q. Did Maxwell ever offer to buy you a

25

Page 34 1 camera? MS. MENNINGER: Objection, leading. 2 THE WITNESS: Yes. 3 4 BY MS. McCAWLEY: 5 Was there anything you were supposed to do Q. 6 in order to get the camera? 7 MS. MENNINGER: Objection, leading. THE WITNESS: I did not know that there 8 were expectations of me to get the camera until 9 She had purchased the camera for me, 10 and I was over there giving Jeffrey a massage. 11 I did not know that she was in possession of 12 the camera until later. 13 She told me -- called me after I had left 14 and said, I have the camera for you, but you 15 cannot receive it yet because you came here and 16 didn't finish your job and I had to finish it 17 for you. 18 BY MS. McCAWLEY: 19 And did you -- what did you understand her 20 Ο. 21 to mean? 22 She was implying that I did not get Α. Jeffrey off, and so she had to do it. 23 And when you say "get Jeffrey off," do you 24 Ο. 25 mean bring him to orgasm?



Page 35 Α. Yes. 1 Did Ghislaine ever describe to you what 2 Ο. types of girls Jeffrey liked? Α. Model types. 4 5 Did Ghislaine ever talk to you about how Q. 6 you should act around Jeffrey? 7 She just had a conversation with me that I Α. should always act grateful. 8 Did Jeffrey ever tell you that he took a 9 girl's virginity? 10 He did not tell me. He told a friend of 11 Α. 12 mine. 13 Ο. And what do you recall about that? MS. MENNINGER: Objection, hearsay, 14 foundation. 15 THE WITNESS: He wanted to have a friend 16 17 of mine come out who was cardio-kickboxer instructor. She was a physical trainer. 18 19 And so I brought her over to the house, and he told my friend Rachel that -- he said, 20 You see that girl over there laying by the 21 22 She was 19. And he said, I just took pool? her virginity. And my friend Rachel was 23 mortified. 24



25

Page 36 BY MS. McCAWLEY: 1 Based on what you knew, did Maxwell know 2 Q. that the type of massages Jeffrey was getting typically involved sexual acts? 4 5 MS. MENNINGER: Objection, foundation, 6 leading. 7 THE WITNESS: Yes. BY MS. McCAWLEY: 8 Q. What was Maxwell's main job with respect 9 to Jeffrey? 10 MS. MENNINGER: Objection, foundation. 11 THE WITNESS: Well, beyond companionship, 12 her job, as it related to me, was to find other 13 girls that would perform massages for him and 14 herself. 15 BY MS. McCAWLEY: 16 17 Q. Did Maxwell ever refer to the girls in a particular way? 18 19 At one point when we were in the islands, we were all watching a movie and she called us her 20 children. 21 22 Did anybody respond to that? Q. I don't recall. 23 Α. Did she ever refer to herself as a mother? 24 Ο.



Yes, like a mother hen.

25

Α.

- 1 Q. Do you remember anything notable about the
- 2 phone calls?
- 3 A. I just remember I always had to say, He's
- 4 unavailable, can I take a message?
- 5 Q. And where did you take a message?
- 6 A. On a little notepad next to the phone.
- 7 Q. Do you recall any small children calling
- 8 the house that day?
- 9 A. No.
- 10 Q. Were you speaking to anyone about their
- 11 school experience or anything like that?
- 12 A. No.
- Q. Did you take any messages for famous
- 14 people?
- 15 A. They could have been famous and I would
- 16 have been clueless.
- 17 Q. Did you take messages at any other point
- 18 during the time that you worked with Jeffrey?
- 19 A. No.
- Q. And you said you remember at the end of
- 21 that day being paid by Ghislaine?
- 22 A. Yes.
- Q. And you were paid for doing the errands
- 24 and answering phones and whatever else you did?
- 25 A. Yes.



- 1 Q. When you came upstairs, where was Virginia
- 2 sitting?
- 3 A. I don't remember.
- Q. Do you remember what she was wearing?
- 5 A. No.
- 6 Q. She was already there when you got back
- 7 from sightseeing?
- 8 A. Yes.
- 9 Q. Tell me what happened with the caricature.
- 10 A. Ghislaine asked me to come to a closet.
- 11 She just said, Come with me. We went to a closet
- 12 and grabbed the puppet, the puppet of Prince Andrew.
- 13 And I knew it was Prince Andrew because I had
- 14 recognized him as a person. I didn't know who he
- 15 was.
- And so when I saw the tag that said Prince
- 17 Andrew, then it clicked. I'm like, that's who it
- 18 is.
- 19 And we went down -- back down to the
- 20 living room, and she brought it in. It was just
- 21 funny because -- he thought it was funny because it
- 22 was him.
- 23 O. Tell me how it came to be that there was a
- 24 picture taken.
- MS. McCAWLEY: Objection.



| | Page 83 |
|----|---|
| 1 | THE WITNESS: I just remember someone |
| 2 | suggesting a photo, and they told us to go get |
| 3 | on the couch. And so Andrew and Virginia sat |
| 4 | on the couch, and they put the puppet, the |
| 5 | puppet on her lap. |
| 6 | And so then I sat on Andrew's lap, and I |
| 7 | believe on my own volition, and they took the |
| 8 | puppet's hands and put it on Virginia's breast, |
| 9 | and so Andrew put his on mine. |
| 10 | BY MS. MENNINGER: |
| 11 | Q. And this was done in a joking manner? |
| 12 | MS. McCAWLEY: Objection. |
| 13 | THE WITNESS: Yes. |
| 14 | BY MS. MENNINGER: |
| 15 | Q. Do you recall a photo being taken of that |
| 16 | event? |
| 17 | A. Yes. |
| 18 | Q. You've never seen the photo? |
| 19 | A. No. |
| 20 | Q. You don't know whose camera it was? |
| 21 | A. No. |
| 22 | Q. Virginia was sitting on the couch next to |
| 23 | Andrew, not in a big leather armchair? |
| 24 | A. Maybe. I'm just trying to remember how I |
| 25 | remember it. |



- 1 exposed her bra, and she grabbed it and pulled it
- 2 down.
- 3 Q. Anything else?
- 4 A. That was the conversation that he had told
- 5 her that he had taken this girl's virginity, the
- 6 girl by the pool.
- 7 Q. Okay. Did Maxwell ever say to you that it
- 8 takes the pressure off of her to have other girls
- 9 around?
- 10 A. She implied that, yes.
- 11 Q. In what way?
- 12 A. Sexually.
- 13 Q. And earlier Laura asked you, I believe, if
- 14 Maxwell ever asked you to perform any sexual acts,
- 15 and I believe your testimony was no, but then you
- 16 also previously stated that during the camera
- 17 incident that Maxwell had talked to you about not
- 18 finishing the job.
- 19 Did you understand "not finishing the job"
- 20 meaning bringing Jeffrey to orgasm?
- MS. MENNINGER: Objection, leading, form.
- 22 BY MS. McCAWLEY:
- Q. I'm sorry, Johanna, let me correct that
- 24 question.
- What did you understand Maxwell to mean



Page 143 when she said you hadn't finished the job, with 1 respect to the camera? 2 MS. MENNINGER: Objection, leading, form. 3 4 THE WITNESS: She implied that I had not 5 brought him to orgasm. BY MS. McCAWLEY: 6 7 So is it fair to say that Maxwell expected you to perform sexual acts when you were massaging 8 9 Jeffrey? 10 MS. MENNINGER: Objection, leading, form, foundation. 11 12 THE WITNESS: I can answer? Yes, I took that conversation to mean that 13 is what was expected of me. 14 BY MS. McCAWLEY: 15 And then you mentioned, I believe, when 16 Ο. you were testifying earlier that Jeffrey told you a 17 story about sex on the plane. What was that about? 18 19 MS. MENNINGER: Objection, hearsay. THE WITNESS: He told me one time Emmy was 2.0 sleeping on the plane, and they were getting 21 22 ready to land. And he went and woke her up, and she thought that meant he wanted a blow 23 job, so she started to unzip his pants, and he 24 25 said, No, no, no, you just have to be awake for



- 1 A. No.
- Q. Was it in the context of anything?
- 3 A. About the camera that she had bought for
- 4 me.
- 5 Q. What did she say in relationship to the
- 6 camera that she bought for you and taking
- 7 photographs of you?
- 8 A. Just that Jeffrey would like to have some
- 9 photos of me, and she asked me to take photos of
- 10 myself.
- 11 Q. What did you say?
- 12 A. I don't remember saying no, but I never
- 13 ended up following through. I think I tried once.
- 14 Q. This was the pre-selfie era, correct?
- 15 A. Exactly.
- 16 Q. I want to go back to this: You testified
- 17 to two things just now with Sigrid that you said
- 18 were implied to you.
- 19 A. Okay.
- 20 Q. The first one was it would take pressure
- 21 off of Maxwell to have more girls around?
- 22 A. Right.
- Q. What exactly did Maxwell say to you that
- led you to believe that was her implication?
- 25 A. She said she doesn't have the time or



| | Page 160 |
|----|---|
| 1 | |
| 2 | CERTIFICATE |
| 3 | STATE OF FLORIDA) |
| | : ss |
| 4 | COUNTY OF MIAMI-DADE) |
| 5 | I, KELLI ANN WILLIS, a Registered |
| 6 | Professional, Certified Realtime Reporter and |
| 7 | Notary Public within and for The State of |
| 8 | Florida, do hereby certify: |
| 9 | That JOHANNA SJOBERG, the witness whose |
| 10 | deposition is hereinbefore set forth was duly |
| 11 | sworn by me and that such Deposition is a true |
| 12 | record of the testimony given by the witness. |
| 13 | I further certify that I am not related |
| 14 | to any of the parties to this action by blood |
| 15 | or marriage, and that I am in no way interested |
| 16 | in the outcome of this matter. |
| 17 | IN WITNESS WHEREOF, I have hereunto set |
| 18 | my hand this 18th day of May, 2016. |
| 19 | |
| 20 | |
| | KELLI ANN WILLIS, RPR, CRR |
| 21 | |
| 22 | |
| 23 | |
| 24 | |
| 25 | |



Do you remember there being a job posting that 1 2 you felt like was appropriate for Virginia or did you just 3 go out and talk to the woman who ran the spa area on your 4 own? 5 I just talked to Angela. Okay. Do you recall whether this was intended 6 7 to be a full-time job? 8 I don't remember if it was full time or just 9 summer jobs or, you know, during season. It was probably 10 for a season because Mar-a-Lago is seasonal. 11 I mean, I was there year round but a lot of 12 people are seasonal, you know, because it's like 13 snowbirds, you know, summertime comes and nobody wants to be down in south Florida. 14 15 Q What would you call the season, the seasonal aspect of Mar-a-Lago? What's the season? 16 17 Probably from September or October to, you know, 18 maybe May, I guess. 19 Is that the coolest time? 20 Times of the year, yes. 21 And it's more guests that come during that Q period of time? 22 23 Α Yes. 24 And is there more staff brought on during that 25 period of time? Owen & Associates Court Reporters

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we'll call her Angela.

A We've got to call her something, but, you know, I didn't really know what her job title was, but I was glad that they would give her a job.

Q Right.

A You know, and that, you know, I was hoping she would be happy; that way she could, you know, go back and forth to work with me. She didn't have to drive or nothing.

- Q Did you drive to and from work with her?
- A Yes. Pretty sure I did, yeah.
- Q Do you remember her hours being relatively the same as yours?
 - A I'm pretty sure they were. Yes.
- Q Do you recall her being in school at the same time?
- A No, I don't recall. I don't remember if she was in school or not.
- Q Is it possible it was over, say, winter break or --
- A I don't remember. I'm sorry. This is so long ago. I mean, some things stick in my mind but some things I just don't remember.
 - Q Do you remember whether Virginia wore a uniform?
 - A Yes, I think she did. Yeah. I think everybody

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Q So you don't know if it was a couple days or a couple weeks or a couple months or a couple years?

Anything in that --

A Well, it wasn't a couple years. It might have been two weeks to two months. I don't know. It wasn't a whole long time, you know.

Q Where were you when Virginia told you she might be going to try to get this other job?

A Probably at work. She might have told me, like, at lunch or whatever. I don't remember. That was so many years ago. I just remember she said Ms. Maxwell was going to, you know, get her a job with Jeffrey Epstein and learn massage therapy. And I thought, well, that's great, you know, because learning new jobs is all about life, you know.

You've got to learn each -- you know, I've learned a lot of different things over my lifetime so it's good to learn every new job you can because that can help you later in life and that's what I think I told her.

- Q Okay. So the best you can recall today is you had a conversation with her sometime at lunch perhaps at Mar-a-Lago where she told you she was going to try to get another job?
 - A Yes. And I thought that was a good thing.
 - Q Do you know now that you recall that, what
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No. 1 Α Did she ever call you from that home? 2 Q 3 Not that I know of. Α 4 Was this when she was still living at home with 0 5 you on Rackley Road? 6 Yes. Yes. 7 0 Not Rackley Drive. 8 Rackley Road. 9 Q Do you know whether Michael was living with you 10 at Rackley Road at the time or not? 11 I don't think so. I don't remember. I didn't Α 12 care for Michael. Of course, what parent cares for your 13 daughter's boyfriend. 14 Why didn't you care for Michael? 15 I didn't think anybody was good enough for my daughter but that's just me. 16 17 I suspect you're right about all fathers. 18 Do you remember her telling you anything about 19 what her job with Mr. Epstein was going to be or was? 20 She said it was going to be massage therapy. 21 Okay. Did she tell you she was getting some Q 22 training? 23 Α Yes. 24 Did she tell you about the training? Q 25 She just said she was being trained in Α Owen & Associates Court Reporters P.O. Box 157, Ocala, Florida 352.624.2258 * owenassocs@aol.com

```
1
     massage therapy.
 2
               All right. When she came home at night from
 3
     working with Mr. Epstein, did she look distressed to you
 4
     in any way?
 5
               Not that I remember.
 6
               Okay. Did she report any complaints about her
 7
     job with Mr. Epstein?
 8
               Not to me.
          Α
 9
          Q
               Okay. Did she report them to anyone else who
10
     then reported them to you?
11
          Α
               No.
12
               Your wife, for example?
13
               I have no idea. Like I said, if she did tell my
14
     wife, I never heard about it.
               Okay. Have you ever met Ms. Maxwell?
15
          Q
16
               Not that I remember ever meeting her.
          Α
17
               Do you know what she looks like?
          Q
18
          Α
               No.
19
               Did you ever meet anyone else who worked with
20
     Mr. Epstein?
21
          Α
               No.
22
               Do you remember anyone else who worked for
          Q
23
     Mr. Epstein bringing your daughter home, for example?
24
          Α
               No.
25
               Did your daughter ever move into the home where
          Q
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```

```
Okay. But your hours, if I understood you
1
          Q
     right, were approximately 7:00 a.m. to 3:00 p.m.?
 2
 3
          Α
               Yes.
               And Tuesday through Saturday?
 4
 5
               Yes.
          Α
               Those hours would be the same time as somebody
 6
 7
     her age would have been in high school?
 8
               Yes.
          Α
 9
               Okay. So does that -- does that give an
10
     indication to you that the short period of time she was
11
     working was during the summer when there was not school?
12
               It seems to be that way.
13
               Okay.
          0
14
          Α
               I mean, to me, yeah.
15
          Q
               It could have been a summer job?
               Yes, it could have been.
16
          Α
17
               Okay. You would not have, as a father, had her
18
     working somewhere instead of going to school?
19
               No, I wouldn't.
20
               And the day that Virginia came and spoke to you
21
     about meeting someone named Ms. Maxwell who was offering
22
     her another job, do you remember the conversation that you
23
     had with Virginia on that day?
24
               No, not really. I just remember Virginia saying
25
     that, you know, she met Ms. Maxwell at the spa and that
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And there it describes her job at Mar-a-Lago as
 1
          Q
     lasting from August 2000 to September of 2001. Do you see
 2
     that?
 3
               Yes.
 4
          Α
 5
               Does that refresh your memory about how long she
 6
     was working there?
 7
               MR. EDWARDS:
                            Form.
               THE WITNESS: She didn't work that long.
 8
 9
               MS. MENNINGER: Okay.
10
               THE WITNESS: Like I say, it was more, like,
11
          a couple of weeks. It wasn't --
12
     BY MS. MENNINGER:
13
               Well, earlier you testified it, might have been
14
     a couple of months?
15
               Well, you know, for me, two weeks, two months, I
     mean, I don't even remember how long I worked at
16
17
     Mar-a-Lago. I told you I worked there six years and
18
     according to them, it was, like, three years. Seemed like
19
     six.
20
               Well, earlier you testified that Mar-a-Lago was
21
     more of a seasonal place, correct?
22
               Yes, well, it is seasonal. But I mean, they
          Α
23
     could be open up the spa area during the summer too
24
     because I'm sure a lot of people in Palm Beach come to get
25
     massages and things like that. I mean, you know, the only
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352.624.2258 * owenassocs@aol.com

```
part they close off is where the chefs and all that, where
 1
     they didn't do any more big events and stuff.
 2
 3
          Q
               Okay.
 4
               But I think the kitchen was still open.
 5
     they had a dining room.
               So if she didn't work there that long
 6
 7
     August 2000 -- even though August is in the summer -- it
 8
     would not be unusual in your mind?
 9
          Α
               No.
10
               Okay. So she could have started working in
          Q
     August of 2000, correct?
11
12
               She could have, yeah.
13
               And while you don't think she worked all the way
14
     until September of 2001 --
15
          Α
               No.
16
               -- that would be consistent with your
17
     recollection of it being more seasonal in the fall,
18
     September --
19
               MR. EDWARDS:
                             Object to the form.
20
               THE WITNESS:
                             Yes.
21
     BY MS. MENNINGER:
22
               So if she worked in the fall, September,
          Q
23
     October, something like that, that seems likes that
24
     accords with your memory, correct?
25
               MR. EDWARDS: Object to the form.
               Owen & Associates Court Reporters
                 P.O. Box 157, Ocala, Florida
               352.624.2258 * owenassocs@aol.com
```

| 1 | CERTIFICATE | | | |
|----|---|--|--|--|
| 2 | STATE OF FLORIDA | | | |
| 3 | COUNTY OF MARION | | | |
| 4 | I, Karla Layfield, RMR, Stenographic Court | | | |
| 5 | Reporter, do hereby certify that I was authorized to and | | | |
| 6 | did stenographically report the foregoing deposition of | | | |
| 7 | Sky Roberts; that said witness was duly sworn to testify | | | |
| 8 | truthfully; and that the foregoing pages, numbered 1 | | | |
| 9 | through 142, inclusive, constitute a true and correct | | | |
| 10 | record of the testimony given by said witness to the best | | | |
| 11 | of my ability. | | | |
| 12 | I FURTHER CERTIFY that I am not a relative or | | | |
| 13 | employee or attorney or counsel of any of the parties | | | |
| 14 | hereto, nor a relative or employee of such attorney or | | | |
| 15 | counsel, nor am I financially interested in the action. | | | |
| 16 | WITNESS MY HAND this day of May, 2016, at | | | |
| 17 | Ocala, Marion County, Florida. | | | |
| 18 | | | | |
| 19 | Karla Layfield, RMR | | | |
| 20 | Stenographic Court Reporter | | | |
| 21 | | | | |
| 22 | | | | |
| 23 | | | | |
| 24 | | | | |

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25

| | | Page 1 | | | | Page 3 |
|----------|---|---------|----------|------------------|----------------------|--------|
| | UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE No.08-CV-80119-CIV-MARRA/JOHNSON | rage r | 1 2 | | TTON, ESQUIRE | rage 3 |
| | JANE DOE NO. 2, | | | | TTON & LUTTIER | |
| | | | 3 | West Palm Beach | r Drive, Suite 400 | |
| | Plaintiff,
-vs- | | 4 | Phone: 561.842. | | |
| | JEFFREY EPSTEIN, | | | rcrit@bclclaw.co | | |
| | | | 5 | mpike@bclclaw. | com | |
| | Defendant. | | 6 | | | |
| | Related cases: | | 8 | | | |
| | 08-80232, 08-80380, 98-80381, 08-80994,
08-80993, 08-80811, 08-80893, 09-80469, | | 9 | | | |
| | 09-80591, 09-80656, 09-80802, 09-81092 | | 10 | | | |
| | VIDEOTABED DEDOCITION OF HAM ALESS! | * | 11 | | | |
| | VIDEOTAPED DEPOSITION OF JUAN ALESSI
VOLUME I | | 12
13 | | | |
| | Tuesday, September 8, 2009 | | 14 | | | |
| | 10:12 a.m 3:45 p.m. | | 15 | | | |
| | | | 16 | | | |
| | 2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33401 | | 17 | | | |
| | west Faini Beach, Florida 33401 | | 18
19 | | | |
| | | | 20 | | | |
| | Reported By: | | 21 | | | |
| | Sandra W. Townsend, FPR
Notary Public, State of Florida | | 22 | | | |
| | PROSE COURT REPORTING AGENCY West Palm Beach Office | | 23 | | | |
| | West I aim Beach Office | | 24
25 | | | |
| | | Page 2 | | | | Page 4 |
| 1 | APPEARANCES: | 20.90 2 | | | | 20.90 |
| 2 | On behalf of the Plaintiffs: | | 1 2 |
гун | -
IBITS | |
| 3 | RICHARD WILLITS, ESQUIRE
RICHARD H. WILLITS, P.A. | | 3 | LAII | 10113 | |
| 4 | 2290 10th Avenue North, Suite 404
Lake Worth, Florida 33461 | | 4 | | • | |
| 5 | Phone: 561.582.7600 | | 1 | NUMBER | DESCRIPTION | PAGE |
| 6 | reelrhw@hotmail.com | | 5 | | | |
| 7 | STUART MERMELSTEIN, ESQUIRE
MERMELSTEIN & HOROWITZ, P.A. | | 6 | Exhibit number 1 | Photographs | 45 |
| 8 | 18205 Biscayne Boulevard, Suite 2218
Miami, Florida 33160 | | 7 | Exhibit number 2 | Transcript | 130 |
| 9 | Phone: 305.931.2200 | | 8 | Exhibit number 3 | Incident Report | 137 |
| 10 | ssm@sexabuseattorney.com
ahorowitz@sexabuseattorney.com | | 9 | Exhibit number 4 | Incorporation Papers | |
| 11 | WILLIAM I. BERGER, ESQUIRE
ROTHSTEIN ROSENFELDT ADLER | | 10 | Exhibit number 5 | Incorporation Papers | 150 |
| 12 | 401 East Las Olas Boulevard, Suite 1650 | | 12 | | | |
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Phone: 954.522.3456 | | 13 | | | |
| 14 | bedwards@rra-law.com | | 14 | | | |
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| | skuvin@leopoldkuvin.com | | 23 | | | |
| 22
23 | | | 24 | | | |
| 24
25 | | | 25 | | | |
| 27 | | | g. | | | |

1 (Pages 1 to 4)

(561) 832-7500 PROSE COURT REPORTING AGENCY, INC. (561) 832-7506

| MS, EZELL: Tru going to ask — I don't know whether you've still been serially designating as Exhibits or whether we're doing them separately for deposition. | | Page 45 | | Page 47 |
|--|----------|--|----|--|
| whether you've still been serially designating Exhibits or whether we're doing them separately for deposition. MR. CRITION: Ithink we cannot trust that people will do them serially. I'd do them with make the me serially. I'd do them with make the me serially. I'd do them with make the me serially out are, I really make the me old you are, I really make the low old you are, I really make. CRITION: Kathy thinks she's 25. MR. CRITION: Kathy thinks she's 25. MR. ERLIL: I may dreams. HE WITNESS: Now, again, I must tell you, I was never told to check any i.d. so any of the people who work at the house. BY MS. EZELL: I may dreams. HE WITNESS: Now, again, I must tell you, I was never told to check any i.d. so any of the people who work at the house. BY MS. EZELL: I may dreams. HE WITNESS: Now, again, I must tell you, I was never told to check any i.d. so any of the people who work at the house. BY MS. EZELL: I may dreams. HE WITNESS: Now, again, I must tell you, I was never told to check any i.d. so any of the people who work at the house. BY MS. EZELL: I may dreams. HE WITNESS: Now, again, I must tell you, I was never told to check any i.d. so any of the people who work at the house. BY MS. EZELL: I may dreams. HE WITNESS: Now, again, I must tell you, I was never told to check any i.d. so any of the people who work at the house. BY MS. EZELL: I may dreams. HE WITNESS: Now, again, I must tell you, I was never told to check any i.d. so any of the people who work at the house. BY MS. EZELL: I may dreams. HE WITNESS: Now, again, I must tell you, I was never told to check any i.d. so any of the people who work at the house. BY MS. EZELL: | | _ | 1 | |
| 3 Exhibits or whether we're doing them separately for deposition. 3 | | | | |
| deposition. MR. CRITTON: I think we cannot trust that be people will do them serially. I'd do them with each one. MS. EZELL: Then would you mark this, please, as Exhibit 1 to this deposition. MS. EZELL: Then would you mark this, please, as Exhibit 1 to this deposition. And Trn just going to state on the record that lit was never told to check any id, so on any of the people who work at the house. BY MS. EZELL: Then would you mark this, please, as Exhibit 1 to this deposition. CExhibit number 1 was marked for life will keep that original. We will not attach it to the deposition uproposes and retained by Counsel for the life will have a composed in the september of the plaintiffs.) MR. CRITTON: Kathy thinks she's 25. MR. CRITTON: Condition of the people who work at the house. BY MS. EZELL: 10. Q. I understand that. And, so, 1 think I'm just trying to establish that you didn't consider it part of your job description to worry about or consider the ages - A. No. Q Ond, so, you never really focused on that or particularly thought about it if they seemed young? MR. CRITTON: Form. The WITNESS: Hose backering the ages - A. No. Q Ond, so, you never really focused on that or particularly thought about it if they seemed young? MR. CRITTON: Let me just note my objection, as I did in A. Rod's deposition or Mr. Rodriguez's Eage 46 deposition, that I know you're going to confiscate Exhibit number 1. I think it's inappropriate. 1 think I should be allowed to h | | | | |
| MR. CRITION: Ithink we cannot trust that people will do them serially. I'd do them with each one. | | | | |
| MS. EZELL: Then would you mark this, please, as Exhibit I to this deposition. | | - | | • |
| 7 HE WITNESS: Now, again, I must tell you, I 8 MS. EZELL: Then would you mark this, please, 9 as Exhibit I to this deposition. 10 And I'm just going to state on the record that 11 I will keep that original. We will not attach it 12 to the deposition. 12 (Exhibit number I was marked for 13 did in A. Rod's deposition purposes and retained by Counsel for the 15 Plaintiffs.) 16 THE WITNESS: Yes, that's 17 BY MS. EZELL: 18 Q. Can you identify that the young woman in 19 those pictures? 20 A. Yes. 21 Q. Who is it? 22 A. That's V V. Now that you says R., that 23 is V.R. definite, a hundred percent. 24 MR. CRITTON: Let me just note my objection, 25 as I did in A. Rod's deposition or Mr. Rodriguez's 26 Exhibit number I. I think it's inappropriate. I 27 affinite I shink I should be allowed to have a copy of 28 in initials, date and number. 29 MR. EZELL. Sure. 30 Oh, you did? 41 MR. WILLITS: She marked it. 42 MR. CRITTON: She's nooding that she did 43 the pust put a number or a letter? 44 MR. CRITTON: She's nooding that she did 45 everything that she usually does, which means, 166 initials, date and number. 177 MR. MERRELETEN: You can talk, 178 MR. MERRELETEN: You can talk, 179 MR. MERRELETEN: You can talk, 170 MR. MERRELETEN: You can talk, 170 MR. MERRELETEN: You can talk, 170 MR. MERRELETEN: You can talk, 171 MR. MERRELETEN: You can talk, 172 MR. MERRELETEN: You can talk, 173 MR. MERRELETEN: You can talk, 174 MR. MERRELETEN: You can talk, 175 MR. MERRELETEN: You can talk, 176 MR. MERRELETEN: You can talk, 177 MR. MERRELETEN: You can talk, 178 MR. MERRELETEN: You can talk, 179 MR. MERRELETEN: You can talk, 170 MR. MERRELETEN: You can talk, 179 MR. MERRELETEN: You can talk, 170 MR. MERRELETEN: You can talk, 171 MR. MERRELETEN: You can talk, 172 MR. MERRELETEN: You can talk, 173 MR. MERRELETEN: You can talk, 174 M | 100 | 1 | | |
| 8 MS_EZELL: Then would you mark this, please, 9 as Exhibit 1 to this deposition. 10 And I'm just going to state on the record that 11 I will keep that original. We will not attach it 12 to the deposition. 13 (Exhibit number 1 was marked for 14 identification purposes and retained by Counsel for the 15 Plaintiffs.) 16 THE WITNESS: Yes, that's 17 BY MS_EZELL: 17 A. No. 18 Q. Can you identify that the young woman in 19 those pictures? 20 A. Yes. 21 Q. Who is it? 22 A. That's V V. Now that you says R., that 23 is V.R. definite, a hundred percent. 24 MR_CRITTOTON: Let me just note my objection, 25 as I did in A. Rod's deposition or Mr, Rodriguez's 26 Age 46 1 deposition, that I know you're going to confiscate 27 Exhibit number 1. I think it's inappropriate. I flift are being used in deposition. 28 Hills that are being used in deposition. 29 MR_EEZELL: Sure. 20 Oh, you did? 30 MR_EEZELL: Sure. 31 MR_RERGER: I would ask that the court reporter initial that. 4 MR_ERGITON: She's modding that she did 4 Exhibits that are being used in deposition. 4 MR_EEZELL: Sure. 4 MR_RERGER: I would ask that the court reporter initial that. 4 MR_RERGER: Did she put her initials or did 5 MR_BERGER: Did she put her initials or did 5 MR_RERGER: Did she put her initials or did 5 MR_RERGER: Did she put her initials or did 5 MR_RERGER: Did she put her initials or did 5 MR_RERGER: Did she put her initials or did 5 MR_RERGER: Did she put her initials or did 5 MR_RERGER: Did she put her initials or did 5 MR_RERGER: Did she put her initials or did 6 initials, date and number. 6 MR_RERGER: Did she put her initials or did 7 MR_MERMELSTEIN: You can talk. 6 MR_RERGER: Did she put her initials use your 7 MR_MERMELSTEIN: You can talk. 6 MR_RERGER: Did she put her initials, use your 7 MR_MERGER: Did she was a massage therapist. She will go for dinner. And they will go for | | | | |
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| trying to establish that you didn't consider it part of identification purposes and retained by Counsel for the Plaintiffs.) THE WITNESS: Yes, that's — 16 BY MS. EZELL: 17 A No. 17 BY MS. EZELL: 18 Q. Can you identify that — the young woman in those pictures? 19 A Yes. 20 A Yes. 20 Q. Who is it? 21 A. That's V. — V. Now that you says R., that 22 is V.R. definite, a hundred percent. 23 is V.R. definite, a hundred percent. 24 MR. CRITTON: Let me just note my objection, as I did in A. Rod's deposition or Mr. Rodriguez's 25 By MS. EZELL: 30 MR. BERGER: I would ask that the court reporter initial that. 39 MS. EZELL: Sure. 39 MR. BERGER: I would ask that the court reporter initial that. 39 MR. BERGER: Did she put her initials or did she just put a number or a letter? 30 MR. REITTON: She marked it. 30 MR. CRITTON: She's nodding that she did everything that she usually does, which means, initials, date and number. 40 MR. MR. WILLITS: But when you talk, use your initials. 40 BY MS. EZELL: 40 BY MS. EZELL: 40 Con you identify that — the young woman in the your gender that is they your consider the ages. 41 La would says — A. No. 40 Q. — of the young women that came there? A. A hosolutely not. Absolutely not. Abs | 10-10-00 | The state of the s | | |
| 13 | | | | - |
| 14 identification purposes and retained by Counsel for the Plaintiffs.) | | | | |
| 15 Plaintiffs.) 16 THE WITNESS: Yes, that's 17 BY MS, EZELL: 18 Q. Can you identify that the young woman in 19 those pictures? 20 A. Yes. 21 Q. Who is it? 22 A. That's V V. Now that you says R., that 22 A. That's V V. Now that you says R., that 23 is V.R. definite, a hundred percent. 24 MR. CRITTON: Let me just note my objection, 25 as I did in A. Rod's deposition or Mr. Rodriguez's 26 deposition, that I know you're going to confiscate 27 Exhibit number 1. I think it's inappropriate. I 28 think I should be allowed to have a copy of 29 Exhibits that are being used in deposition. But 29 I'll file a motion with the Court so we don't get 29 into a pulling match over your Exhibits. 29 MS. EZELL: Sure. 20 A. No. 20 A. A bsolutely not. Absolutely not. 20 A. Absolutely not. Absolutely not. 20 A. A bsolutely not. Absolutely not. 21 A. Absolutely not. Absolutely not. 22 A. That's V V. Now that you says R., that 23 at he house. I never saw except the two girls 24 at the house. I never saw except the two girls 25 that I many young girls, you know, young, underage girls 26 at the house. I never saw except the two girls 27 that I would a sk that I know you're going to confiscate 28 Exhibit number 1. I think it's inappropriate. I 29 Exhibits that are being used in deposition. But 30 I'll file a motion with the Court so we don't get 31 into a pulling match over your Exhibits. 32 for into a pulling match over your Exhibits. 33 think I should be allowed to have a copy of 44 Exhibits that are being used in deposition. But 45 I'll file a motion with the Court so we don't get 46 into a pulling match over your Exhibits. 47 MR. BERGER: I would ask that the court 48 reporter initial that. 49 MS. EZELL: Sure. 40 Diny of the movies and she sang sometimes 41 because she was a singer. So she sung at the 42 house. Beautiful girl. Very talented. 43 That's the only girl that I know that it 44 wasI would says, underage. 41 WR. CRITTON: She's nodding that she did 42 cverything that she usually does, which means, initials, | | | | |
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| 17 | -0.5000 | * | | 03/24/0094 |
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| 20 A. Yes. 21 Q. Who is it? 22 A. That's V V. Now that you says R., that 23 is V.R. definite, a hundred percent. 24 MR. CRITTON: Let me just note my objection, 25 as I did in A. Rod's deposition or Mr. Rodriguez's 26 A. That's V V. Now that you says R., that 27 is V.R. definite, a hundred percent. 28 MR. CRITTON: Let me just note my objection, 29 at the house. I never saw except the two girls 20 at the house. I never saw except the two girls 21 that I mentioned that I think it was underage was 22 N. for sure because she was still in high school. 24 Page 48 25 Page 46 26 deposition, that I know you're going to confiscate 27 Exhibit number 1. I think it's inappropriate. I at think I should be allowed to have a copy of the will go for dimer. And she because she was a singer. So she sung at the house. Beautiful girl. Very talented. 28 That's the only girl that I know that it was —I would says, underage. 29 BY MS. EZELL: 20 Okay. Did — who told you that V.R. was a massage therapist? 20 Did you assume that she was a massage. 20 Did you assume that she was coming to give massage? | | | | |
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| | 19 | initials. | 19 | therapist because you were told she was coming to give |
| Q. How old did you think V.R. was at the time she 21 A. No. I assumed she was a massage therapy | 20 | BY MS. EZELL: | 20 | massage? |
| | 21 | Q. How old did you think V.R. was at the time she | 21 | A. No. I assumed she was a massage therapy |
| began coming to Mr. Epstein's home? 22 because I was I drove Ms. Maxwell to Mar-a-lago, | 22 | began coming to Mr. Epstein's home? | 22 | because I was I drove Ms. Maxwell to Mar-a-lago, |
| A. She could have been 17, 18, 19. 23 Donald Trump's residence. And I wait in the car while | 23 | A. She could have been 17, 18, 19. | 23 | Donald Trump's residence. And I wait in the car while |
| | 1 | | 24 | Ms. Maxwell got a I think it was a facial or massage. |
| 25 MR. CRITTON: Form. 25 I don't know. But that day I remember this girl, V., | 25 | MR. CRITTON: Form. | 25 | I don't know. But that day I remember this girl, V., |

12 (Pages 45 to 48)

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Page 51 Page 49 there. So I would says, between three months maybe 1 walking down from the main lobby towards the spa of 1 2 Mar-a-lago. And I was driving Ms. Maxwell up, up the 2 before I left. And I think I left at the end of the 3 ramp. It's a little ramp there. 3 year, so it could have been -- I remember it was a very 4 And Ms. Maxwell says, stop. And she went and 4 hard day because I had to wait in the sun outside in a 5 5 talked to -- she went inside. convertible and I was dying, waiting for an hour for 6 6 And that afternoon around 5:00 I saw V. came. Ms. Maxwell. I think it was in the summer of 2002. 7 She came to the house already, so she was there already. 7 Q. And if I remember correctly, you left in 8 That was the first day I knew. And then she would come 8 November or December of 2002? 9 9 regularly. A. Yes. 10 Q. Did you ever meet any of V.'s family? 10 Q. So that might have been perhaps July or August 11 A. No. I think she was -- one time I think her of 2002? 11 12 father drove her there. And I met -- I don't know if it 12 A. Uh-huh. was the boyfriend or husband or -- but he had to wait, 13 13 Q. And, so, as I understand it, you only saw V.R. come to that house during the last three months of your 14 make him wait outside while she was at the house. 14 15 Q. Do you know the name or recognize the name 15 time at Mr. Epstein's? 16 Tony Santiago? 16 A. Yes. 17 A. I think it was him. 17 Q. Do you have any -- any sense or can you 18 O. That was her --18 approximate how many times she came? 19 19 A. I know he had an old beat-up car, Camaro or A. I cannot give you a number, but I would says, 20 Mustang. I know it was very old car that I make him 20 two, three times a week. 21 wait on the street one time. I make him come out of the 21 Q. You mentioned that sometimes you would have to 22 driveway because we have to move some cars around. 22 call these massage therapists in the middle of the 23 Q. Did there ever come a time when Tony Santiago 23 night. Did you ever have to call V. for Mr. Epstein in 24 was welcome in the kitchen? 24 the middle of the night? A. I think he came once in the kitchen, but 25 25 MR. CRITTON: Form. Page 50 Page 52 1 Ms. Maxwell told me to get him out. 1 THE WITNESS: No. No. 2 Q. Did she tell you why? 2 BY MS. EZELL: 3 A. No. She didn't -- I guess she didn't want to 3 Q. Did there come a time while you were there 4 become, you know, everybody -- because some of these 4 that V.R. stayed in the house? 5 people came with their husbands and they wait outside. 5 MR. CRITTON: Form. 6 And I guess she didn't want this to become a norm for 6 THE WITNESS: I don't think so. I cannot 7 everybody to bring their companions while they have --7 remember. No. 8 8 they will do a massage for her. BY MS. EZELL: 9 Q. During the time you were there, did you ever 9 Q. How many bedrooms were there upstairs? 10 know of Tony Santiago bringing any other girls to 10 A. One, two, three -- one, two, three, four --11 four -- so that would be five, five bedrooms. Mr. Epstein? 11 12 A. No. I knew that sometimes I saw V. bring 12 Q. Five. And, so, would one have been 13 other girls with her, not Tony Santiago. 13 Mr. Epstein's bedroom? 14 Q. Do you remember the names of any of those 14 A. Yes. His quarters was big, huge quarters. 15 girls --15 O. Sort of a suite? 16 A. No, I don't. 16 A. Yeah. And he has -- this is the room. His 17 Q. -- that V. brought? 17 bathroom was here and her bathroom was here. The main 18 A. That was at the end of my stay there. No. room was here. And we have -- it was two sets of doors 18 That was a very -- at the very end of the last month of 19 19 before -- two sets of double doors before you can go 20 into the suite. There was one on top of the stairway my stay. 20 21 Q. Did you give -- I don't believe I asked you, 21 and one in the middle of the hallway. And then you walk 22 but if I did, forgive me. Did you give us an 22 into the -- into the suite. 23 approximate year in which you were taking Ms. Maxwell to 23 Q. Okay. And you -- you just put a red eight by 24 Mar-a-lago and saw V.R. for the first time? 24 11 folder in front of you? 25 A. That was at the -- at the end of my stay 25 A. Yeah.

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Page 57 Page 59 1 A. Yes. Before she was married, yeah. They 1 Q. And they called him uncle, you said? 2 2 A. They called him uncle. split up and she went her own way. Q. Did you ever learn what Tony Santiago did for 3 Q. Did she marry a Glen Dubin (phonetics)? 3 A. That's correct. And Mr. Dubin used to come to 4 a living? 4 5 5 A. No. the house, too. O. Do vou know, was Sarah Kellen ever one of the 6 Q. Have you had any occasion to see him since the 6 7 massage therapists before she became an assistant? 7 time you left Mr. Epstein's employ? 8 A. I don't know if she was a massage therapist. 8 I don't remember setting up a massage table for her. I 9 9 Q. And you don't -- do you have any idea where he 10 think she was an assistant. And she would call -- at 10 is? 11 11 A. I have no idea. I remember an incident, one the end of my stay, I was -- tried to pull aside from my obligations and Sarah was doing all the phone calls and 12 time the -- I went to pick her up at Royal Palm Beach 12 13 all the arrangement and all the looking out for these 13 and she was crying and I went and knock at the door and girls for the -- for massage therapists. They were 14 she was crying. And she says, well, -- I think it was 14 15 constantly. 15 Tony or -- because she used to live with these other 16 Q. When did that role get transferred from you to 16 guys, too. There were two guys and her or two couples. 17 17 I don't know the arrangements there. But I remember Ms. Maxwell, the role of looking after girls and calling 18 the girls? 18 that she told me the -- Tony or her boyfriend had got 19 19 mad and ripped the furniture, he cut the furniture in A. I didn't look after -- out for girls. 20 20 pieces and he even broke the screens. Because I was --Ms. Maxwell was the one that recruit -- I remember one 21 when I went into to knock the door, the screen was all occasion or two occasions she would says to me, John, 21 22 give me a list of all the spas in Palm Beach County. 22 ripped up like it was cut. 23 And I will drive her from one to the other one to PGA 23 And she told me that he got mad at -- I don't 24 and Boca. And she will go in, drop credit cards -- not 24 know what happened. I never saw him in there. 25 25 Q. Did she tell you he had hit her or beaten her credit cards, but business cards, and she come out. And Page 60 Page 58 1 then we go to -- she will recruit the girls. Was 1 at all? 2 never -- never done by me or Mr. Epstein or anybody 2 MR. CRITTON: Is the she, V., V.R.? 3 else, that I know. 3 MS. EZELL: Yes. Thank you. 4 I don't know about Sarah because Sarah was 4 BY MS. EZELL: 5 there at the last, last -- probably last weeks of my 5 Q. Did you ever see during the time you were 6 stay there. So I cannot say anything about Sarah. 6 there photographs of V. in the house, the Epstein house 7 Q. Was there any point in time -- well, let me 7 V.R. in the Epstein house? 8 ask you this way: Did -- you said sometimes you would 8 A. I don't think so. I don't think so. 9 call the girls to come --9 Q. Did you ever see photographs of V.R. in 10 Ms. Maxwell's albums? A. Uh-huh. 10 Q. -- to give them massage. And sometimes 11 11 12 12 Q. At the time you were employed by Mr. Epstein, Ms. Maxwell would? 13 A. Yeah. 13 were there any hidden cameras? 14 Q. Did there come a time when she took that over 14 A. No. 15 entirely from you --15 Q. You do know that he installed some after you 16 A. No. 16 left, correct? 17 Q. -- or that continued --17 MR. CRITTON: Correct. 18 A. That's continued. 18 THE WITNESS: I don't know. 19 Q. -- until you left? 19 BY MS. EZELL: 20 A. Yeah. 20 Q. Wasn't there a camera involved in the incident 21 Q. Do you remember, is Jeffrey Epstein godfather 21 that -- the incident in which you took money from 22 to one of the Dubin children? 22 Mr. Epstein? 23 A. I don't know if he godfather. I don't 23 A. Yeah. Yes. But I don't know if he install it or not. That's what he told me. 24 remember that. But he was very fond to these children, 24 25 25 Q. Okay. the children.

5 (Pages 57 to 60)

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PROSE COURT REPORTING AGENCY, INC.

| | Page 77 | | Page 79 |
|-----|--|----------|---|
| 1 | Q. What kind of costume? | 1 | CERTIFICATE OF OATH |
| 2 | A. I don't know. It was a black, shiny costume. | 2 | STATE OF FLORIDA |
| 3 | I never saw it on her. | 3 | COUNTY OF PALM BEACH |
| 4 | Q. Was it leather? | 4 | |
| 5 | | 5 | |
| 6 | A. No. I think it was like a vinyl. But we were | 6 | I, the undersigned authority, certify that |
| | very fussy about touching any of that stuff. We just | 7 | JUAN ALESSI personally appeared before me and was duly |
| 7 | MS. EZELL: No other questions. Thank you, | 8 | sworn on the 8th day of September, 2009. |
| 8 | sir. | 9 | D - 14'-104 1031 2000 |
| 9 | THE WITNESS: You're welcome. | 10 | Dated this 19th day of September, 2009. |
| 10 | MR. LANGINO: I shouldn't have more than a | 11
12 | |
| 11 | half hour's worth of questions, if everybody is | 13 | |
| 12 | okay to power through. | 14 | |
| 13 | MR. BERGER: I probably have a half hour to an | | Sandrahamound (1) |
| 14 | hour. | 15 | |
| 15 | MR. LANGINO: Okay. | | Sandra W. Townsend, Court Reporter |
| 16 | MR. BERGER: Unless you cover what I cover. | 16 | Notary Public - State of Florida |
| 17 | MR. MERMELSTEIN: I could say the same thing, | | My Commission Expires: 6/26/12 |
| 18 | so probably less than that. | 17 | My Commission No.: DD 793913 |
| 19 | MR. LANGINO: So I guess my question is | 18 | |
| 20 | MR. BERGER: I think we ought to take a break. | 19 | |
| 21 | MR. LANGINO: That was my question. | 20 | |
| 22 | MR. BERGER: We're going to take a break. | 21
22 | |
| 23 | Do you have any problem with that? | 23 | |
| 24 | THE WITNESS: No. Whatever you guys want to | 24 | |
| 25 | do. | 25 | |
| | Page 78 | | Page 80 |
| 1 | (Lymah magana) | 1 | CERTIFICATE |
| 1 2 | (Lunch recess.) (Continued to Volume II.) | 2 | STATE OF FLORIDA |
| 1 | (Continued to Volume II.) | 3
4 | COUNTY OF PALM BEACH |
| 3 | | 5 | I, Sandra W. Townsend, Court Reporter and |
| 4 | | 6 | Notary Public in and for the State of Florida at Large,
do hereby certify that the aforementioned witness was by |
| 5 | | | me first duly sworn to testify the whole truth; that I |
| 6 | | 7 | was authorized to and did report said deposition in stenotype; and that the foregoing pages numbered 1 to |
| 7 | | 8 | 78, inclusive, are a true and correct transcription of |
| 8 | | 9 | my shorthand notes of said deposition. |
| 9 | | 7 | I further certify that said deposition was |
| 10 | | 10 | taken at the time and place hereinabove set forth and
that the taking of said deposition was commenced and |
| 11 | | 11 | completed as hereinabove set out. |
| 12 | | 12 | I further certify that I am not attorney or
counsel of any of the parties, nor am I a relative or |
| 13 | | 13 | counsel of any of the parties, nor am I a relative or employee of any attorney or counsel of party connected |
| 14 | | 1.4 | with the action, nor am I financially interested in the |
| 15 | | 14
15 | action. The foregoing certification of this transcript |
| 16 | | | does not apply to any reproduction of the same by any |
| 17 | | 16 | means unless under the direct control and/or direction of the certifying reporter. |
| 18 | | 17 | |
| 19 | | 18 | Dated this 19th day of September, 2009. |
| 20 | | 19 | ,,,,, |
| 21 | | 20 | Sandragannoud |
| 22 | | 21 | • |
| 23 | | 22 | Sandra W. Townsend, Court Reporter |
| 24 | | 23 | |
| 25 | | 24
25 | |

20 (Pages 77 to 80)

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PROSE COURT REPORTING AGENCY, INC.

- Q. -- would be the young one?
- 2 A. Yeah.

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- Q. You stated that Ms. Maxwell was very hard on you and you got blamed for everything, and that you -- you liked the job and you liked Mr. Epstein, but you didn't like working for Mrs. Maxwell?
 - A. That's correct.
 - Q. Can you tell me why, other than that she blamed you for everything?
 - A. She came from a very wealthy family and she was -- just my opinion; I give my personal opinion -- that she was rotten spoiled and she tried to drive the house like a palace and not a home.

I was -- I discussed it with her, many, many times we have discussions. And sometimes I even refuse to do her orders, knowing that I was going to be backed up by Mr. Epstein or do the right thing, my thinking of running the house should be. But we never had a good relationship at all from the beginning, I don't think so. But I was -- have to be her driver and she will go and shop all over the malls and I will have to go behind her, pay for it and bring the bags to the car.

Next day or the same day she will do shopping and buy and say, John, go to this store and get it. It was a lot of work. It was a lot that she created and

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PROSE COURT REPORTING AGENCY, INC.

Page 213

- 1 most of this jobs that she created.
- Q. And one of those things you also had to do with her was to take her to different spas?
 - A. Yes.

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- Q. And there she would recruit young women to come and do massages?
 - A. Because she was English. And she didn't know the area too much as well as I knew. So she -- she says, John, make a list of all the massage -- the spas in the area from Jupiter to Boca Raton. And we went to all the main spas. And then we went to the schools for massage therapists, and all the massage parlors, and massage, the small massage.

So I make a list from the telephone book and we would go from one to the another one. I would wait in the car and she goes in.

And sometime she took a couple minutes and walk out with cards, business cards. And that -- she did the recruiting.

And from then, she pick up the girls and that was the end of it. I never did any recruiting and I never really saw him doing it.

- Q. You really never saw?
- A. Never saw Mr. Epstein recruiting anybody.

 MS. EZELL: All right. I have no other

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PROSE COURT REPORTING AGENCY, INC.

Page 1

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA CASE NO:502008CA028051XXXXMB AB

L.M.

Plaintiff,

-vs-

JEFFREY EPSTEIN AND SARAH KELLEN,

Defendants.

DEPOSITION OF JANUSZ BANASIAK

Tuesday, February 16, 2010 10:09 - 2:30 p.m.

250 Australian Avenue South
Suite 1500
West Palm Beach, Florida 33401

Reported By: Cynthia Hopkins, RPR, FPR Notary Public, State of Florida Prose Court Reporting Job No.: 1317

(561) 832-7500 PROSE COURT REPORTING AGENCY, INC. (561) 832-7506

| | Page 8 |
|----|---|
| 1 | Q. What family was that? |
| 2 | A. It's, it was an older house in New York. I |
| 3 | worked there for seven years, no, five years before I |
| 4 | get the job in the Seagram company. So, I guess I had |
| 5 | some experience to continue. |
| 6 | Q. Do you remember the name of the family |
| 7 | that you worked with for seven years in New York? |
| 8 | A. Frank, Frank. |
| 9 | Q. His name is something Frank, F-r-a-n-k? |
| 10 | A. Yes. |
| 11 | Q. Do you remember the first name? |
| 12 | A. Fredrick. |
| 13 | Q. And were your duties as house manager for |
| 14 | Fredrick Frank similar to your duties as house |
| 15 | manager for Jeffrey Epstein? |
| 16 | A. Yes, yes. |
| 17 | Q. And when you started in 2005 when you |
| 18 | heard that there was a job position with Jeffrey |
| 19 | Epstein, did you interview for that position? |
| 20 | A. Yes. |
| 21 | Q. Who did you interview with? |
| 22 | A. First I got interviewed with Ghislaine |
| 23 | Maxwell. |
| 24 | Q. And that's G-h-i-s-l-a-i-n-e, Maxwell? |
| 25 | A. Right, right. |
| | |

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PROSE COURT REPORTING AGENCY, INC.

| | Page 9 |
|----|--|
| 1 | Q. Where did that interview take place? |
| 2 | A. In New York. |
| 3 | Q. And it was for the position as house |
| 4 | manager in the Palm Beach house, correct? |
| 5 | A. Right. |
| 6 | Q. That's at 358 Albrillo way? |
| 7 | A. Correct. |
| 8 | Q. Why were you interviewed in New York, if |
| 9 | you know? |
| 10 | A. Because at that time I was living in New York |
| 11 | with my friends and so |
| 12 | Q. Where did the interview take place in New |
| 13 | York? |
| 14 | A. In her house on 65th Street. |
| 15 | Q. Whose house, do you know? |
| 16 | A. Ghislaine Maxwell. |
| 17 | Q. So, Ghislaine Maxwell interviewed you back |
| 18 | in 2005 at her house in New York for a position at |
| 19 | Jeffrey Epstein's house in Palm Beach? |
| 20 | A. Right. |
| 21 | Q. And what did the interview consist of? |
| 22 | What did she ask you? |
| 23 | A. She asked me basic questions, you know, what's |
| 24 | my previous employer, how long I work for them and |
| 25 | basically she was checking my resume. |
| | |

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PROSE COURT REPORTING AGENCY, INC.

Page 14 1 Ο. Okay. So, I assume then that your wife 2 that you are separated from I quess at the time, she didn't come down to Palm Beach? 3 4 Α. No, no. 5 Ο. And this is somebody who still lives 6 somewhere other than Florida? 7 Α. Correct. So, you came down in February 2005 and 8 Ο. 9 began working. What did you, what did you first start doing for Jeffrey Epstein? 10 11 First I doing? I don't remember nothing 12 special. 13 Well, were you working -- I will Ο. 14 rephrase it. Were you working only for Jeffrey Epstein or were you working also for Ghislaine 15 Maxwell, the other person who interviewed you, or 16 17 anybody else in the house? I guess only for him because she was visiting 18 Α. 19 a few times house, but I am employed by him. 20 Q. Okay. What was your understanding at that 21 time as to the relationship between Ghislaine 22 Maxwell and Jeffrey Epstein? They were like partners in business. 23 Α. 24 Q. Okay. What business was that, if you 25 know?

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PROSE COURT REPORTING AGENCY, INC.

Page 15

- A. I don't know what kind of business but she was the one who organized I would say employment with this organization. So, whatever I need, if I have some kind of problem, I contact her. She was the one who decided what I have to answer my problems with, what I was supposed to do.
 - Q. How many times did you have problems where you had to go through her?
- A. Well, not big problems. Just a question of what certain, how to do certain things. For example, what kind of flowers I have to buy, what kind of things he likes, what time I supposed to serve him coffee in the mornings, sort of organizing things.
 - Q. Those are things that you wouldn't ask Jeffrey Epstein directly?
 - A. No, no. He doesn't like those things to ask him directly. He would like to prefer either through his assistant or like I say, Ghislaine Maxwell.
 - Q. Is that still the same today?
- A. Yes, still the same. Unless, something happen that I need to, nobody is around and I need to urgently contact him, I go to him directly.
- Q. So, for the most part if you have a question or at least -- let's go back to 2005, you had a question about what needed to be done in the

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PROSE COURT REPORTING AGENCY, INC.

| | Page 54 |
|----|---|
| 1 | A. (Witness shakes head.) |
| 2 | Q. And I'm sorry. |
| 3 | A. No. |
| 4 | Q. I understood you when you shook your head. |
| 5 | A. I realize what you told me but I am sorry. |
| 6 | Q. I told you it was easy to forget. |
| 7 | Do you remember who it was that personally |
| 8 | removed the computers and equipment from the |
| 9 | property? Was it Mr. Epstein, was it a lawyer, was |
| 10 | it, do you remember? |
| 11 | A. It was Adriana. |
| 12 | Q. All right. And I am of the understanding |
| 13 | that there were several computers that were removed |
| 14 | from the house, correct? |
| 15 | MR. GOLDBERGER: Form. |
| 16 | THE WITNESS: Yes, three of them. |
| 17 | BY MR. EDWARDS: |
| 18 | Q. Three? And to your knowledge Adriana |
| 19 | removed all of them? |
| 20 | A. She show up one day with gentleman. I don't |
| 21 | remember his name. And she told me that they are moving |
| 22 | out those computers. |
| 23 | Q. And where were the computers? Which rooms |
| 24 | were the computers in that were removed by Adriana |
| 25 | and this gentleman you're describing? |
| 1 | |

(561) 832-7500 PROSE COURT REPORTING AGENCY, INC. (561) 832-7506

| _ | Page 191 |
|----|---|
| 1 | CERTIFICATE OF OATH |
| 2 | THE STATE OF FLORIDA |
| 3 | COUNTY OF PALM BEACH |
| 4 | |
| 5 | |
| 6 | I, the undersigned authority, certify that |
| 7 | JANUSZ BANASIAK personally appeared before me |
| 8 | and was duly sworn on the 16th day of February, |
| 9 | 2010. |
| 10 | |
| 11 | Dated this 28th day of February, 2010. |
| 12 | |
| 13 | |
| 14 | NDTC ₂ |
| 15 | Cynahia J. Hophins |
| 16 | oluova, |
| 17 | Cynthia Hopkins, RPR, FPR
Notary Public - State of Florida |
| 18 | My Commission Expires: February 25, 2011 My Commission No.: DD 643788 |
| 19 | |
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PROSE COURT REPORTING AGENCY, INC.

| | Page 192 |
|----|--|
| 1 | CERTIFICATE |
| 2 | THE STATE OF FLORIDA |
| 3 | COUNTY OF PALM BEACH |
| 4 | |
| 5 | I, Cynthia Hopkins, Registered Professional |
| 6 | Reporter, Florida Professional Reporter and Notary Public in and for the State of Florida at large, do hereby certify that I was authorized to and did |
| 7 | report said deposition in stenotype; and that the foregoing pages are a true and correct transcription |
| 8 | of my shorthand notes of said deposition. |
| 9 | I further certify that said deposition was |
| 10 | taken at the time and place hereinabove set forth and that the taking of said deposition was commenced and completed as hereinabove set out. |
| 11 | |
| 12 | I further certify that I am not attorney or counsel of any of the parties, nor am I a relative or employee of any attorney or counsel of party |
| 13 | connected with the action, nor am I financially interested in the action. |
| 14 | The foregoing certification of this transcript |
| 15 | does not apply to any reproduction of the same by any means unless under the direct control and/or |
| 16 | direction of the certifying reporter. |
| 17 | Dated this 28th day of February, 2010. |
| 18 | |
| 19 | |
| 20 | Cynathia J. Hoghers |
| 21 | Cynthia Hopkins, RPR, FPR |
| 22 | |
| 23 | |
| 24 | |
| 25 | |

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PROSE COURT REPORTING AGENCY, INC.

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09-22783

Condensed Transcript

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA CIVIL DIVISION

L.M.,

Plaintiff,

vs.

CASE No. 502008CA028051XXXXMB AB

JEFFREY EPSTEIN,

Defendant.

DEPOSITION OF

LOUELLA RABUYO

VOLUME I

October, 20, 2009 10:10 a.m.

515 N. Flagler Drive Suite 200-P West Palm Beach, Florida 33401

Reported By: Teresa Whalen, RPR, FPR, Notary Public, State of Florida



Toll Free: 866.709.8777 Facsimile: 561.394.2621

Louella Rabuyo - Volume I

October 20, 2009

| 1 | 3 |
|---|--|
| IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT | |
| IN AND FOR PALM BEACH COUNTY, FLORIDA
CIVIL DIVISION
CASE NO.502008CA028051XXXXMB AB | On behalf of the Defendant: |
| L.M., Plaintiff, | ROBERT D. CRITTON, JR., ESQUIRE 4 BURMAN CRITTON LUTTIER & COLEMAN, LLP |
| -vs-
JEFFREY EPSTEIN, | 303 Banyan Boulevard, Suite 400 West Palm Beach, Florida 33401 |
| Defendant. | Phone: 561.842.2820 |
| | 7 On behalf of Plaintiff L.M.:
8 BRADLEY J. EDWARDS, ESQUIRE |
| DEPOSITION OF LOUELLA RABUYO
VOLUME I | CARA L. HOLMES, ESQUIRE 9 ROTHSTEIN ROSENFELDT ADLER |
| Tuesday, October, 20, 2009
10:10 - 3:30 p.m. | 401 E. Las Olas Boulevard, Suite 1650
Fort Lauderdale, Florida 33394
Phone: 954.522.3456 |
| 515 N. Flagler Drive, Suite 200-P
West Palm Beach, Florida 33401 | 11 12 On behalf of the Witness: 13 BRUCE E. REINHART, ESQUIRE |
| Reported By:
Teresa Whalen, RPR, FPR | LAW OFFICE OF BRUCE E. REINHART 250 S. Australian Avenue, Suite 1400 West Palm Beach, Florida 33401 |
| Notary Public, State of Florida
West Palm Beach Office Job #118991 | 15 Phone: 561.202.6360 |
| | 17 On behalf of Defendants/Jane Does 2 - 8: 18 STUART S. MERMELSTEIN, ESQUIRE |
| | MEMMELSTEIN & HOROWITZ, P.A. 19 18205 Biscayne Boulevard, Suite 2218 |
| | Miami, Florida 33160
20 Phone: 305.931.2200 |
| | 21 On behalf of Plaintiff in related Case No. 08-80811 22 JACK HILL, ESQUIRE (Partially via speakerphone) |
| | SEARCY, DENNEY, SCAROLA, BARNHART & SHIPLEY 23 2139 Palm Beach Lakes Boulevard |
| | West Palm Beach, Florida 33409 24 Phone: 561.686.6300 25 |
| 2 | 4 |
| 1 UNITED STATES DISTRICT COURT | 1 |
| SOUTHERN DISTRICT OF FLORIDA | 2 INDEX |
| CASE No.08-CV-80119-CIV-MARRA/JOHNSON | 3 |
| JANE DOE NO. 2, | 5 WITNESS: DIRECT CROSS REDIRECT RECROSS |
| Plaintiff, | 6 |
| 7 JEFFREY EPSTEIN,
8 Defendant. | LOUELLA RABUYO |
| 9 Related cases: | 8 BY MR. EDWARDS: 5 190 |
| 08-80232, 08-80380, 98-80381, 08-80994,
0 08-80993, 08-80811, 08-80893, 09-80469, | 9 BY MR. MERMELSTEIN: 135 208 |
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11 BY MR. CRITTON: 173 |
| 2 | 12 BY MR. CHITTON. 173 |
| DEPOSITION OF LOUELLA RABUYO 3 VOLUME I | 13 |
| | |
| 4
Tuesday, October 20, 2009 | 14 EXHIBITS |
| 4 | 15 |
| 4 Tuesday, October 20, 2009
5 10:10 - 3:30 p.m.
6 515 N. Flagler Drive, Suite 200-P | |
| 4 Tuesday, October 20, 2009
5 10:10 - 3:30 p.m.
6 515 N. Flagler Drive, Suite 200-P
7 West Palm Beach, Florida 33401 | 15 16 17 NUMBER DESCRIPTION PAGE 18 DEFENDANT'S EX. 1 COPIES, COMPOSITE PHOTOGRAPHS 10 |
| Tuesday, October 20, 2009 10:10 - 3:30 p.m. 515 N. Flagler Drive, Suite 200-P West Palm Beach, Florida 33401 | 15 16 17 NUMBER DESCRIPTION PAGE 18 DEFENDANT'S EX. 1 COPIES, COMPOSITE PHOTOGRAPHS 10 19 DEFENDANT'S EX. 2 COMPOSITE PHONE MESSAGE BOOK 1 |
| Tuesday, October 20, 2009 10:10 - 3:30 p.m. 5 15 N. Flagler Drive, Suite 200-P West Palm Beach, Florida 33401 | 15 16 17 NUMBER DESCRIPTION PAGE 18 DEFENDANT'S EX. 1 COPIES, COMPOSITE PHOTOGRAPHS 10 19 DEFENDANT'S EX. 2 COMPOSITE PHONE MESSAGE BOOK 1 20 DEFENDANT'S EX. 3 COPY OF PHOTOGRAPH 162 |
| Tuesday, October 20, 2009 10:10 - 3:30 p.m. 515 N. Flagler Drive, Suite 200-P West Palm Beach, Florida 33401 Reported By: Teresa Whalen, RPR, FPR | 15 16 17 NUMBER DESCRIPTION PAGE 18 DEFENDANT'S EX. 1 COPIES, COMPOSITE PHOTOGRAPHS 10 19 DEFENDANT'S EX. 2 COMPOSITE PHONE MESSAGE BOOK 1 20 DEFENDANT'S EX. 3 COPY OF PHOTOGRAPH 162 21 |
| Tuesday, October 20, 2009 10:10 - 3:30 p.m. 515 N. Flagler Drive, Suite 200-P West Palm Beach, Florida 33401 Reported By: | 15 16 17 NUMBER DESCRIPTION PAGE 18 DEFENDANT'S EX. 1 COPIES, COMPOSITE PHOTOGRAPHS 10 19 DEFENDANT'S EX. 2 COMPOSITE PHONE MESSAGE BOOK 1 20 DEFENDANT'S EX. 3 COPY OF PHOTOGRAPH 162 21 22 |
| Tuesday, October 20, 2009 10:10 - 3:30 p.m. 515 N. Flagler Drive, Suite 200-P West Palm Beach, Florida 33401 Reported By: Teresa Whalen, RPR, FPR Notary Public, State of Florida | 15 16 17 NUMBER DESCRIPTION PAGE 18 DEFENDANT'S EX. 1 COPIES, COMPOSITE PHOTOGRAPHS 10 19 DEFENDANT'S EX. 2 COMPOSITE PHONE MESSAGE BOOK 1 20 DEFENDANT'S EX. 3 COPY OF PHOTOGRAPH 162 21 |



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Louella Rabuyo - Volume I

October 20, 2009

| | 81 | | 83 |
|---|--|---|--|
| 1 | A When I came back to report, that's how I | 1 | Q So are we talking about the day the police |
| 2 | learned. | 2 | went to Jeffrey Epstein's house you did not go in the |
| 3 | Q Elaborate on that for me. What do you mean, | 3 | morning, but you went after lunch and the police had |
| 4 | when you came back to report that's how I learned? | 4 | already left? |
| - 5 | A I reported in the afternoon, and then that's | 5 | A Oh. No. When I went there nobody was there, |
| 6 | how I learned that the police came. | 6 | no policemen were around. |
| 7 | Q All right. And when were you you're now | 7 | Q Who was at the house then? |
| 8 | saying you came back to report and you learned that the | 8 | A Janusz, and Douglas, the architect. |
| 9 | police had already come to the house, right? | 9 | Q Schoettle? |
| 10 | A Yes, sir. | 10 | A Yes. |
| 11 | Q Prior to that occasion, when was the previous | 11 | Q And did you have a discussion with them? |
| 12 | time that you were at the house? | 12 | A No. |
| 13 | A The day before. | 13 | Q How did you know the police had been to the |
| 14 | Q Okay. And the day before you left your shift | 14 | house? |
| 15 | at roughly five o'clock? | 15 | A Janusz told me. |
| 16 | A I cannot remember. I usually leave 5:00 or | 16 | Q When? |
| 17 | 5:30. | 17 | A When I arrive. |
| 18 | Q But sometime late in the afternoon? | 18 | Q That's what I was asking you when I said did |
| 19 | A Yes. | 19 | you have a discussion with them, meaning Janusz and |
| | | | Douglas. |
| 20
21 | Q And as of that time, the day before the search | 20
21 | • |
| 22 | warrant was issued, you had seen no police officers in or around the house? | 22 | A Okay. Being because them with Janusz only. Q What did he say? |
| | | 23 | · · · · · · · · · · · · · · · · · · · |
| 23 | A No. | ì | A He said the police came and, what's this, took |
| 24 | Q And then the next day you reported to the job at what time? | 24
25 | away some stuff. Q Did he say what they took? |
| | | | |
| 25 | at what time: | 1 | Q Did he say what they took? |
| 25 | 82 | | 84 |
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| ***************** | 82 | | 84 |
| 1 | 82 A The next day? | 1 | 84 A He said pictures. |
| 1 2 | 82 A The next day? Q The next day. | 1 2 | 84 A He said pictures. Q Did he tell you which pictures? |
| 1 2 3 | 82 A The next day? Q The next day. A I report in the afternoon. | 1
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3 | A He said pictures. Q Did he tell you which pictures? A No, sir. |
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from Mr. Epstein's closet?



A After lunch, about -- maybe after lunch.

Toll Free: 866.709.8777 Facsimile: 561.394.2621

Louella Rabuyo - Volume I

, d.y 4

October 20, 2009

| | 129 | |
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| 1 | STATE OF FLORIDA | |
| 2 | COUNTY OF PALM BEACH | |
| 3 | | |
| 4 | | |
| 5 | I, the undersigned authority, certify that | |
| 6 | LOUELLA RABUYO personally appeared before me on the 20th | |
| 7 | of October, 2009, and was duly sworn. | |
| 8
9 | Pated this 20th day of October 2000 | |
| 10 | Dated this 30th day of October, 2009. | |
| 11 | | |
| 12 | | |
| 13 | | |
| | | |
| 14 | Tauras Mikalas DDD EDD | |
| 15 | Teresa Whalen, RPR, FPR Notary Public - State of Florida | |
| 1 | My Commission Expires: 4/25/11 | |
| 16 | My Commission No.: DD 644533 | |
| 17 | Job # 118991 | |
| 18 | | |
| 19 | | |
| 20 | | |
| 21 | | |
| 22
23 | | |
| 24 | | |
| 25 | | |
| | 130 | |
| 1 | CERTIFICATE | |
| 2 | STATE OF FLORIDA | |
| 3
4 | COUNTY OF PALM BEACH | |
| 5 | I, Teresa Whalen, Registered Professional | |
| 6 | Reporter and Notary Public in and for the State of Florida at Large, do hereby certify that the | |
| | aforementioned witness was by me first duly sworn to | |
| 7 | testify the whole truth; that I was authorized to and did report said deposition in stenotype; and | |
| 8 | that the foregoing pages are a true and correct | |
| 9 | transcription of my shorthand notes of said deposition. | |
| 10 | I further certify that said deposition was | |
| 11 | taken at the time and place hereinabove set forth and that the taking of said deposition was commenced | |
| ++ | and that the taking of said deposition was commenced and completed as hereinabove set out. | |
| 12 | 16 who a soulf, that I am not offer a sure | |
| 13 | I further certify that I am not attorney or counsel of any of the parties, nor am I a relative or | |
| | employee of any attorney or counsel of party connected | |
| 14 | with the action, nor am I financially interested in the action. | |
| 15 | | |
| 16 | The foregoing certification of this transcript does not apply to any reproduction of the same by any | |
| | means unless under the direct control and/or direction | |
| 17
18 | of the certifying reporter. | |
| 19 | Dated this 30th day of October, 2009. | |
| 100 | | |
| 20 | | |
| 21
22 | Teresa Whalen, RPR, FPR | |
| 21 | Teresa Whalen, RPR, FPR
Job # 118991 | |



Toll Free: 866.709.8777 Facsimile: 561.394.2621

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Page 1
               UNITED STATES DISTRICT COURT
1
               SOUTHERN DISTRICT OF FLORIDA
2
                               Case No: 08-CV-80119
     JANE DOE NO. 2,
3
           Plaintiff,
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5
     Vs
     JEFFREY EPSTEIN,
6
           Defendant.
8
                                Case NO: 08-CV-80232
     JANE DOE NO. 3,
9
           Plaintiff,
10
     Vs
     JEFFREY EPSTEIN,
11
           Defendant.
12
13
                                Case No: 08-CV-80380
     JANE DOE NO. 4,
14
          Plaintiff,
15
     Vs.
16
     JEFFREY EPSTEIN,
17
           Defendant.
18
                                  Case No: 08-CV-80381
     JANE DOE NO. 5,
19
           Plaintiff,
20
     Vs
21
     JEFFREY EPSTEIN,
22
23
           Defendant.
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NON PARTY (VR) 000247

| Page | 2 | Page 4 |
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| 1 JANE DOE NO. 6, Case No: 08-CV-80994 | 1 | VIDEOTAPED |
| 2 Plaintiff, | 2 3 | DEPOSITION
of |
| 3 Vs
4 JEFFREY EPSTEIN, | 4 | ALFREDO RODRIGUEZ |
| 5 Defendant. | 5 | |
| the second secon | 6 | taken on behalf of the Plaintiffs pursuant |
| 6
JANE DOE NO. 7, Case No. 08-CV-80993 | 7 8 | to a Re-Notice of Taking Deposition (Duces Tecum) |
| 7 | 9 | *** |
| Plaintiff, | 10 | APPEARANCES: |
| 8 | 11 | MERMELSTEIN & HOROWITZ, P.A. |
| Vs
9 | 12 | BY: STUART MERMELSTEIN, ESQ. |
| JEFFREY EPSTEIN, | 1 ** | 18205 Biscayne Boulevard |
| 0 | 13 | Suite 2218 |
| Defendant. | 1 | Miami, Florida 33160 |
| 2 C.M.A., Case No: 08-CV-80811 | 14 | Attorney for Jane Doc 2, 3, 4, 5, 6, and 7. |
| 3 Plaintiff, | 15 | 5, and 7. |
| 4 VS | 16 | ROTHSTEIN ROSENFELDT ADLER |
| (S JEFFREY EPSTEIN,
16 Defendant. | 17 | BY: BRAD J. EDWARDS, ESQ., and |
| services where a substitute of the state of | 17 | CARA HOLMES, ESQ. Las Olas City Centre |
| 17 Cara No. 59-CV-90903 | 18 | Suite 1650 |
| JANE DOE, Case No: 08-CV-80893
18 | | 401 East Las Olas Boulevard |
| Plaintiff, | 19 | Fort Lauderdale, Florida 33301 Attorney for Jane Doe and E.W. |
| 19 | 20 | And L.M. |
| Vs
20 | 21 | |
| JEFFREY EPSTEIN, | | PODHURST ORSECK |
| 21 | 22 | BY: KATHERINE W. EZELL
25 West Flagler Street |
| Defendant. | 23 | Suite 800 |
| 22 | | Miami, Florida 33130 |
| 24 | 24
25 | Attorney for Jane Doe 101 and 102. |
| 25 | | |
| Page | 3 | Page 5 |
| 1 JANE DOE NO. II, Case No: 08-CV-80469 | 1 | |
| 2 Plaintiff, | 2 | APPEARANCES: |
| 3 Vs | 3 | LEOPÓLD-KUVIN |
| 4 JEFFREY EPSTEIN, 5 Defendant. | | ADAM J. LANGINO, ESQ. |
| 5 Defendant. | | 2925 PGA Boulevard |
| / | 4 | Suite 200 |
| 6 | 5 | Suite 200
Palm Beach Gardens, Florida 33410 |
| JANE DOE NO. 101, Case No: 09-CV-80591 | 5 | |
| JANE DOE NO. 101, Case No: 09-CV-80591 | | Palm Beach Gardens, Florida 33410 |
| JANE DOE NO. 101, Case No: 09-CV-80591 7 Plaintiff, | 5
6
7 | Palm Beach Gardens, Florida 33410 Attorney for B.B. RICHARD WILLITS, ESQ. 2290 10th Avenue North |
| JANE DOE NO. 101, Case No: 09-CV-80591 7 Plaintiff, 8 | 5 | Palm Beach Gardens, Florida 33410 Attorney for B.B. RICHARD WILLITS, ESQ. 2290 10th Avenue North Suite 404 |
| JANE DOE NO. 101, Case No: 09-CV-80591 7 Plaintiff, | 5
6
7 | Palm Beach Gardens, Florida 33410 Attorney for B.B. RICHARD WILLITS, ESQ. 2290 10th Avenue North |
| JANE DOE NO. 101, Case No: 09-CV-80591 Plaintiff, Vs JEFFREY EPSTEIN, | 5
6
7
8 | Palm Beach Gardens, Florida 33410 Attorney for B.B. RICHARD WILLITS, ESQ. 2290 10th Avenue North Suite 404 Lake Worth, Florida 33461 Attorney for C.M.A. |
| JANE DOE NO. 101, Case No: 09-CV-80591 Plaintiff, Vs JEFFREY EPSTEIN, 10 | 5
6
7
8
9 | Palm Beach Gardens, Florida 33410 Attorney for B.B. RICHARD WILLITS, ESQ. 2290 10th Avenue North Suite 404 Lake Worth, Florida 33461 Attorney for C.M.A. BURMAN, CRITTON, LUTTIER & |
| JANE DOE NO. 101, Case No: 09-CV-80591 Plaintiff, Vs JEFFREY EPSTEIN, Defendant. | 5
6
7
8 | Palm Beach Gardens, Florida 33410 Attorney for B.B. RICHARD WILLITS, ESQ. 2290 10th Avenue North Suite 404 Lake Worth, Florida 33461 Attorney for C.M.A. BURMAN, CRITTON, LUTTIER & COLEMAN, LLP |
| JANE DOE NO. 101, Case No: 09-CV-80591 Plaintiff, Vs JEFFREY EPSTEIN, Defendant. | 5
6
7
8
9 | Palm Beach Gardens, Florida 33410 Attorney for B.B. RICHARD WILLITS, ESQ. 2290 10th Avenue North Suite 404 Lake Worth, Florida 33461 Attorney for C.M.A. BURMAN, CRITTON, LUTTIER & COLEMAN, LLP BY: ROBERT CRITTON, ESQ. 515 North Flagler Drive |
| JANE DOE NO. 101, Case No: 09-CV-80591 Plaintiff, Vs JEFFREY EPSTEIN, Defendant. JANE DOE NO. 102, Case No: 09-CV-80656 | 5
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7
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9
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11
12 | Palm Beach Gardens, Florida 33410 Attorney for B.B. RICHARD WILLITS, ESQ. 2290 10th Avenue North Suite 404 Lake Worth, Florida 33461 Attorney for C.M.A. BURMAN, CRITTON, LUTTIER & COLEMAN, LLP BY: ROBERT CRITTON, ESQ. 515 North Flagler Drive Suite 400 |
| JANE DOE NO. 101, Case No: 09-CV-80591 Plaintiff, Vs JEFFREY EPSTEIN, Defendant. JANE DOE NO. 102, Case No: 09-CV-80656 JANE DOE NO. 102, Case No: 09-CV-80656 Plaintiff, Vs | 5
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10 | Palm Beach Gardens, Florida 33410 Attorney for B.B. RICHARD WILLITS, ESQ. 2290 10th Avenue North Suite 404 Lake Worth, Florida 33461 Attorney for C.M.A. BURMAN, CRITTON, LUTTIER & COLEMAN, LLP BY: ROBERT CRITTON, ESQ. 515 North Flagler Drive |
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2 (Pages 2 to 5)

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NON PARTY (VR) 000248

| | Page 6 | | Page 8 |
|---|---|---|--|
| 1 | INDEX OF EXAMINATION | 1 | Doe right here on the copy you gave me. I'm |
| 2 | | 2 | missing which Jane Doe this is. |
| | WITNESS DIRECT CROSS | 3 | They're all different case numbers. Do |
| | ALFREDO RODRIGUEZ | 4 | you want me to go through each case number? |
| | ALI KEDO KODKIGOLZ | 5 | MR. CRITTON: I'm going to note my |
| | (By Mr. Mermelstein) 12 | 6 | objection. Obviously if this deposition |
| | ` ' | 7 | gets played not obviously, I'm going to |
| | (By Mr, Edwards) 157 | 8 | object to the litany of each one so I don't |
| | (Du Mu Lamaina) 200 | 9 | know how we can separate it out. Maybe if |
| | (By Mr. Langino) 260 | 10 | and when at the time of trial and depending |
| | | 11 | on how the Court determines what comes in |
| | | 12 | and what doesn't with regard to the |
| | INDEX OF EXHIBITS | 13 | consolidated aspects of this. I have no |
| | EXHIBITS PAGE | 14 | great idea other than just saying Jane Doe |
| | 1 Message pad 72
2 Documents 115 | 15 | versus Epstein, et al, or something like |
| | 2 Documents 113 | 16 | that, or Jane Doe, et al. |
| | | 17 | MS. EZELL: Couldn't we just say and |
| | | 18 | those cases which have been consolidated |
| | | 19 | with it for Discovery purposes? |
| ļ | | 20 | MR. EDWARDS: Although there is cases |
| | | 21 | here that have cross noticed this from state |
| | | 22 | court that haven't been consolidated so that |
| | | 23 | may not work. You may have to read them |
| 1 | | 24 | all, if it works out your way that will just |
| 4 | | 25 | get edited out, at least he will have read |
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13 | Florida at Large, in the above cause. THE VIDEOGRAPHER: This is the case of Jane Doe No. 2, plaintiff, versus Jeffrey Epstein, defendant. Jane Doe No. 3, plaintiff, versus Jeffrey Epstein, defendant. Jane Doe No. 4, plaintiff, versus Jeffrey Epstein, defendant. And Jane Doe No. 5, plaintiff, versus Jeffrey Epstein, defendant. Jane Doe No. 6, plaintiff, versus Jeffrey Epstein, | 3
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12 | MR. CRITTON: No. There may be a better suggestion if he starts this is such and such day, it's the deposition of Mr. Rodriguez in the case such and such, and we can almost fill it in depending on which tape it goes, how it fills in, at least we'll have the context of the first and depending on whether the Judge reads it in from a consolidated or they all come related, I have no great idea. MR. EDWARDS: I was thinking if he read |
| .4 | defendant. Jane Doe No. 7, plaintiff, | 14 | every one of them and it was the seventh in |
| 5 | versus Jeffrey Epstein, defendant. CMA, | 15 | line then you just would edit it so you |
| 6 | plaintiff, versus Jeffrey Epstein, | 16 | would only read that one. MR. CRITTON: I'm okay with that too. |
| 7 | defendant. And Jane Doe, plaintiff, versus | 17 | THE VIDEOGRAPHER: On page number three |
| 8 | Jeffrey Epstein, et al, defendant. And Jane | 18 | there is something missing on the top here. |
| 9 | Doe is there a shorter thing that we can | 19 | Do you want me to read each case number |
| 0 | do here? It's also missing this one right | 20 | · · · · · · · · · · · · · · · · · · · |
| 1 | here. | 21 | separately? MR. MERMELSTEIN: I don't think it's |
| | MR. MERMELSTEIN: Do we have a problem | 22 | |
| 2 | | 23 | necessary. |
| 2 | with saying Jane Doe 2 and the Epstein and | 1 | |
| 22
23
24
25 | with saying Jane Doe 2 and the Epstein and related cases? THE VIDEOGRAPHER: I'm missing this Jane | 24
25 | MR. EDWARDS: I don't think it's necessary either. |

3 (Pages 6 to 9)

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|--|---|----------------|--|
| | Page 26 | | Page 28 |
| 1 | with a copy. | 1 | A. Yes. Sometimes very short notice but, |
| 2 | Q. Were you the only one who was allowed to | 2 | yes, I was. |
| 3 | answer the phone? | 3 | Q. So that varied? |
| 4 | A. Yes. | 4 | A. Yes. |
| 5 | Q. I'm sorry, what would you do | 5 | Q. Who would give you that notice? |
| 6 | A. I would leave it on the counter next to | 6 | A. Mrs. Maxwell or Sarah or Larry, the |
| 7 | the kitchen so when I find that piece all crumbled | 7 | pilot. |
| 8 | I knew that Mr. Epstein saw the message, so we | 8 | Q. And then you would drive to pick them up |
| 9 | communicated like that. | 9 | at the airport? |
| 0 | Q. Now, you mentioned Mr. Epstein would give | 10 | A. Yes. |
| 1 | you instructions during the course of the day. | 11 | Q. And who traveled with him? |
| 2 | A. Through his assistant. | 12 | A. The three pilots and some guests. |
| 3 | Q. And his assistant was whom? | 13 | Q. What do you mean by guests? |
| 4 | A. Sarah Kellen. | 14 | A. He will have some friends from Harvard, |
| .5 | Q. But you didn't view her as your | 15 | he will have well, very important people that, |
| 6 | supervisor? | 16 | you know, friends, acquaintances from New York or |
| 7 | A. She take orders from Mrs. Maxwell but she | 17 | Europe because I was just told the number of |
| 8 | will tell me, Alfredo, we need to buy this, we | 18 | people was coming on the plane. |
| 9 | need to do this, and so and so was coming. I | 19 | Q. Were there people who were employed by |
| 0 | couldn't talk directly to Mr. Epstein. | 20 | him who came regularly? |
| 1 | Q. Okay. So any communications from Mr. | 21 | A. Yes. |
| 2 | Epstein always came through Ms. Kellen? | 22 | Q. And who would they be? |
| 3 | A. Or from the office in New York. Lesley, | 23 | A. Like I said, they were the pilots, Larry |
| 24 | his secretary, or somebody else, the comptroller, | 24 | Bisosky, George, and I don't remember the flight |
| 25 | the architect, any lawyer. | 25 | engineer, and he will have two girlfriends. |
| | Page 27 | | Page 29 |
| | <u> </u> | 1 | Q. The pilot would have two girlfriends? |
| 1 | Q. Lawyer, what kind of instructions would | 2 | A. Mr. Epstein. This is all people coming |
| 2 | you get from lawyers? | 3 | in the plane together. |
| 3 | A. We used to have a lot of time, for | 4 | Q. Right. What do you mean by girlfriends? |
| 4 | instance, the dock construction, you need to have | 5 | A. Friends, you know, that he was always |
| 5 | a lot of permits in Palm Beach so they were there | 6 | having friends that he will befriend in New York, |
| 6 | for that reason. | 7 | I don't know, or some other places. |
| 7 | Q. Okay. Now, so you would interact with | 8 | But I was just told my concern was how |
| 8 | the staff from New York and that would include I | 9 | many people I have to feed, how many cars do I |
| 9 | think you said Lesley? | 10 | need to transport these people from the airport to |
| 0 | A. Lesley, Bella. | 11 | the house, and to arrange accommodations in the |
| .1 | Q. What was Lesley's position? | 12 | house. |
| 2 | A. Lesley is the secretary, secretary to Mr. | 13 | Q. What about Sarah Kellen, did she travel |
| 13 | Epstein. | 14 | with him? |
| .4 | Q. Okay. Is that Lesley Groff? | 15 | A. Yes. |
| 15 | A. I believe it was, I don't remember the | 16 | Q. So she was on the plane? |
| 16 | last name. | 17 | A. Yes. |
| | Q. Bella, who was Bella? | 18 | MR. CRITTON: Form. |
| | A. Bella was the assistant comptroller. | 19 | BY MR. MERMELSTEIN: |
| 18 | A a also blash was also like in Nove | | Q. And Ms. Maxwell? |
| 18
19 | Q. Anyone else that you dealt with in New | 1.31 | Alia his havean |
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20 | York? | 20 | MR CRITTON: Form |
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21 | York? A. Doug Shadow was the architect and he used | 21 | MR. CRITTON: Form. |
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22 | York? A. Doug Shadow was the architect and he used to come to the house in a regular basis because we | 21
22 | THE WITNESS: No, she will have different |
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23 | York? A. Doug Shadow was the architect and he used to come to the house in a regular basis because we used to have a lot of projects going on. | 21
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23 | THE WITNESS: No, she will have different plane. |
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25 | York? A. Doug Shadow was the architect and he used to come to the house in a regular basis because we | 21
22 | THE WITNESS: No, she will have different |

8 (Pages 26 to 29)

| 1 2 3 4 5 6 7 8 9 10 111 12 13 14 15 16 17 18 19 20 21 22 23 4 | in cash as opposed to check? MR. CRITTON: Form. THE WITNESS: I was told to pay them cash, sir. BY MR. MERMELSTEIN: Q. Simply you were told and didn't ask why? A. No. Q. Do you recall telling the detective who interviewed you for the police that you thought of yourself as a human ATM machine? MR. CRITTON: Form. THE WITNESS: Yes. BY MR. MERMELSTEIN: Q. You recall saying that? MR. CRITTON: Form. THE WITNESS: Because I always had cash in my pocket. BY MR. MERMELSTEIN: Q. And why was there always cash in your pocket? A. That was part of my job to have, you know, for emergencies or paying somebody cash. Q. Okay. What kind of emergencies? A. It's hard to say. I was supposed to put cash on each Mercedes Benz on each ashtray. The | 1
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25 | A. Not him. I will drive anybody else but he would rather eat at home. Q. So you would drive house guests to restaurants? A. Yes. Q. And when you did that you would didn't you stay with the car or did you eat with them? A. No, I will stay with the car. Q. So who did you tip? A. If you want to park in front of the restaurant you got to tip the valet otherwise you're taking one of the spots. Sometimes I used to take I'm sorry. Aviation, you know, you need to go to aviation and help those guys move your cars around, you need they carry luggage, so I used to tip those too. Q. That would be when you picked up or dropped off Mr. Epstein. Correct? A. Yes. MR. MERMELSTEIN: We'll mark this as an exhibit, composite exhibit. (Composite Exhibit 1 was marked for Identification.) MR. CRITTON: Just out of curiosity, on depositions are we going to use instead of |
|---|---|---|--|
| 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 | idea behind this is you get stranded nobody accept credit card or check you have cash. Q. How much did you leave in the ashtray? A. 300. Q. And did you ever have to replenish that money? A. Yes. Q. Because the Mercedes was stranded? A. No, because when Mr. Epstein will leave I have to collect that money because I will send the cars to the car wash so to avoid that money being stolen we used to keep track, you know, when to retrieve that money and then when he's coming put it back there again. Q. So you use cash for that purpose and you also use cash to pay the masseuses. Correct? A. Yes. Q. Did you use cash for any other purpose? A. Car wash for the guy who used to came to the house and wash all the cars. Tipping sometimes for getting a good spot in the restaurant you have to have cash, something like that. Q. Okay. Would you drive Mr. Epstein to a restaurant? | 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 | Page 73 doing plaintiff and defendant designations do you just want to run them one, two, three, four? MR. MERMELSTEIN: That's fine with me as long as we remember where we left off. MR. CRITTON: Well, are we going to do it consecutive with all of the depositions? I'm okay with that if someone can keep track of that. MR. EDWARDS: I've had that go wrong before, especially when we have some parties who aren't here, such as Mr. Garcia, he's going to join depositions, we have to start at 27 or whatever. MR. CRITTON: For each deposition one through whatever without necessarily giving them a plaintiff or defendant. BY MR. MERMELSTEIN: Q. Mr. Rodriguez, I've marked as Exhibit 1 a composite document which includes four per page of what appear to be message slips. First of all let me ask you, let me direct your attention to the first page of this exhibit. And the upper left message has initials at the bottom. Is that correct? |

19 (Pages 70 to 73)

| | Page 74 | | Page 76 |
|---|--|---|--|
| 1 | A. Yes. | 1 | and he told you he owned a modeling agency? |
| 2 | Q. Are those your initials? | 2 | A. Yes, sir. |
| 3 | A. Yes. | 3 | Q. Anything else he told you? |
| 4 | Q. And was it the household policy to | 4 | A. He spoke, you know, five, six languages, |
| 5 | initial messages when they were taken? | 5 | always speaking Spanish, Italian. |
| | - · · · · · · · · · · · · · · · · · · · | 6 | Q. Did the girls who were you know, who |
| 6 | A. Yes. | 7 | travelled with Mr. Epstein, were they from his |
| 7 | Q. Okay. You were instructed to do that? | | |
| 8 | A. Yes. | 8 | agency? |
| 9 | Q. Who instructed you to do that? | 9 | MR. CRITTON: Form. |
| 10 | A. Ms. Maxwell. There was a manual, sir, in | 10 | THE WITNESS: I don't know, sir. |
| 11 | the house, we had to follow the instructions of | 11 | BY MR. MERMELSTEIN: |
| 12 | the manual. | 12 | Q. You didn't discuss that? |
| 13 | Q. There was okay. | 13 | A. No. |
| | A. Estate manager, household manager for all | 14 | Q. Let's look at the message next to it. |
| 14 | A. Estate manager, nousehold manager for an | 15 | MR. CRITTON: Still on page one? |
| 15 | the houses, so I will abide to that, you know, so | | MR. MERMELSTEIN: Still on page one. |
| 16 | I take message with my initial, the time, who | 16 | BY MR. MERMELSTEIN: Still off page offer. |
| L7 | called. | 17 | O. It appears the one under it is to the |
| 18 | Q. So there were all sorts of policies and | 18 | Q. It appears the one under it is to the |
| 19 | procedures in this manual? | 19 | same person. Is that correct? Who is that? |
| 20 | A. Yes. | 20 | A. Alicia. |
| 21 | Q. Who wrote it? | 21 | Q. Who is Alicia? |
| 22 | A. It was the estate manager for all the | 22 | A. I don't know, sir. Please tell Jeffrey |
| | properties and so I was | 23 | that I called so I just wrote the name. |
| 23 | O Who was the estate manager for all the | 24 | Q. Now, some of these messages if you look |
| 24 | Q. Who was the estate manager for all the | 25 | through appears to be a different handwriting and |
| 25 | properties? | 25 | through appears to be a different hardwriting and |
| | Page 75 | | Page 77 |
| 1 | A. I never met him, sir, he was fired before | 1 | there is no signature on the bottom. |
| 2 | I came along. | 2 | A. That's not mine, I don't know who's that |
| | Q. But you don't remember his name? | 3 | is, sir. |
| 3 | | , – | |
| | A Nim min | 4 | O I thought you said earlier you were the |
| 4 | A. No, sir. | 4 | Q. I thought you said earlier you were the |
| 5 | Q. And you remember one of the things that | 5 | one who was responsible for taking messages. |
| 5
6 | Q. And you remember one of the things that said in this manual was that every message has to | 5
6 | one who was responsible for taking messages. A. Exactly, yes, I was, sir. |
| 5 | Q. And you remember one of the things that | 5
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7 | one who was responsible for taking messages. A. Exactly, yes, I was, sir. Q. But there were other people who took |
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6 | Q. And you remember one of the things that said in this manual was that every message has to be signed? A. Yes. | 5
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8 | one who was responsible for taking messages. A. Exactly, yes, I was, sir. Q. But there were other people who took messages as well? |
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7 | Q. And you remember one of the things that said in this manual was that every message has to be signed?A. Yes.Q. I'm not necessarily going to go through | 5
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9 | one who was responsible for taking messages. A. Exactly, yes, I was, sir. Q. But there were other people who took messages as well? A. Maybe this is after or before my time, |
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9 | Q. And you remember one of the things that said in this manual was that every message has to be signed?A. Yes.Q. I'm not necessarily going to go through | 5
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8 | one who was responsible for taking messages. A. Exactly, yes, I was, sir. Q. But there were other people who took messages as well? A. Maybe this is after or before my time, sir. |
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9 | Q. And you remember one of the things that said in this manual was that every message has to be signed? A. Yes. Q. I'm not necessarily going to go through every single message. Let me go back to the one | 5
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9 | one who was responsible for taking messages. A. Exactly, yes, I was, sir. Q. But there were other people who took messages as well? A. Maybe this is after or before my time, sir. Q. Okay. Because there is no date on it. |
| 5
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10 | Q. And you remember one of the things that said in this manual was that every message has to be signed? A. Yes. Q. I'm not necessarily going to go through every single message. Let me go back to the one on the upper left on the first page. It's from | 5
6
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11 | one who was responsible for taking messages. A. Exactly, yes, I was, sir. Q. But there were other people who took messages as well? A. Maybe this is after or before my time, sir. Q. Okay. Because there is no date on it. |
| 5
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11 | Q. And you remember one of the things that said in this manual was that every message has to be signed? A. Yes. Q. I'm not necessarily going to go through every single message. Let me go back to the one on the upper left on the first page. It's from Jean-Luc. Is that correct? | 5
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12 | one who was responsible for taking messages. A. Exactly, yes, I was, sir. Q. But there were other people who took messages as well? A. Maybe this is after or before my time, sir. Q. Okay. Because there is no date on it. A. I used to put my dates and I know I used |
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20 (Pages 74 to 77)

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|---|---|---|---|
| | Page 150 | 1 | Page 152
Q. The girls who came to the house for |
| 1 | Q. You had a laptop? | 1 2 | massages, did you ever call a cab to bring any of |
| 2 | A. No, it was desktop. | | the girls home? |
| 3 | Q. Okay. So you had your own desktop in the | 3 | |
| 4 | staff house? | 4 | A. Probably on a few occasions. |
|) | A. Yeah. Exactly. | 5 | Q. So is it your understanding that they |
| 5 | Q. And you don't know what was what was | 6 | would have arrived by cab as well? |
| 7 | the files in that computer versus on the other | 7 | MR. CRITTON: Form. |
| 3 | computers? | 8 | THE WITNESS: Yes. |
| 9 | A. No, sir. | 9 | BY MR. MERMELSTEIN: |
| 0 | Q. Did you ever see any pornography on any | 10 | Q. And how would that come about, were you |
| 1 | of the computers? | 11 | given instructions to call a cab by anyone? |
| 2 | A. No, sir. | 12 | A. No, I would call the cab, the taxi. |
| 3 | Q. Are you sure about that? | 13 | Q. How did you know a cab needed to be |
| 4 | A. Pornography as in sexual acts, no. | 14 | called? |
| 5 | Q. Pornography as in naked people, men or | 15 | A. Because Sarah would tell me can you get |
| 5 | women. | 16 | me a taxi. |
| 7 | A. Yeah, there were some. | 17 | Q. So when the girl was finished what she |
| 3 | Q. Okay. And describe to me what that was. | 18 | was doing Sarah would come to you and say |
| 9 | They were like models. | 19 | A. She would call me. |
|) | Q. And where were those in the computer? I | 20 | MR. CRITTON: Form. |
| 1 | mean, how did you access that? | 21 | BY MR. MERMELSTEIN: |
| 2 | They were in the files and some of it | 22 | Q. She would call you? |
| 3 | in you mean which file they were, what was your | 23 | A. Yes. |
| 4 | question? | 24 | Q. Okay. You would be in the guest house at |
| 5 | Q. Where were they in the computer? There | 25 | the time? |
| | Page 151 | | Page 153 |
| 1 | were downloaded files on computer? | 1 | A. Yes. |
| | A met described to the second | 1 2 | Q. Do you recall having to do that often? |
| | A. They were downloaded, ves. | 2 | Q. Do you recall having to do that often |
| | A. They were downloaded, yes. MR. CRITTON: Form. | 3 | A. No, not very often, sir. |
| 3 | MR. CRITTON: Form. | | A. No, not very often, sir. |
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4 | MR. CRITTON: Form. BY MR. MERMELSTEIN: | 3 | A. No, not very often, sir. |
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5 | MR. CRITTON: Form. BY MR. MERMELSTEIN: Q. Okay. There were photographs of naked | 3
4 | A. No, not very often, sir. Q. Did Mr. Epstein keep photograph equipment in the house? A. I don't remember seeing it. |
| 3 4 5 5 6 | MR. CRITTON: Form. BY MR. MERMELSTEIN: Q. Okay. There were photographs of naked women? | 3
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1 | MR. CRITTON: Form. BY MR. MERMELSTEIN: Q. Okay. There were photographs of naked women? A. Models. Q. And why do you say models? A. Because it was like a catalog so you have models, you know. Q. And what was your understanding as a | 3
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| 3456789012345678 | MR. CRITTON: Form. BY MR. MERMELSTEIN: Q. Okay. There were photographs of naked women? A. Models. Q. And why do you say models? A. Because it was like a catalog so you have models, you know. Q. And what was your understanding as a source of these photos? A. I don't know, sir. It was just a curiosity on myself and it was — it was none of my business but, you know, I just happen to see them there. Q. Did these girls appear very young to you? MR. CRITTON: Form. | 3
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19 | A. No, not very often, sir. Q. Did Mr. Epstein keep photograph equipment in the house? A. I don't remember seeing it. Q. Do you recall seeing any video equipment? A. No, sir. Q. Do you recall any video or photograph equipment in the master bedroom? A. No, sir. Q. The models that you saw on the computer, did you recognize any of them as having been at the house? A. No. Q. The girls who stayed at the house, did any of them speak with a foreign accent? A. Yes. Q. Many of them? |
| 345678901234567890 | MR. CRITTON: Form. BY MR. MERMELSTEIN: Q. Okay. There were photographs of naked women? A. Models. Q. And why do you say models? A. Because it was like a catalog so you have models, you know. Q. And what was your understanding as a source of these photos? A. I don't know, sir. It was just a curiosity on myself and it was it was none of my business but, you know, I just happen to see them there. Q. Did these girls appear very young to you? MR. CRITTON: Form. THE WITNESS: No, sir. They were young but not underage. | 3
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20 | A. No, not very often, sir. Q. Did Mr. Epstein keep photograph equipment in the house? A. I don't remember seeing it. Q. Do you recall seeing any video equipment? A. No, sir. Q. Do you recall any video or photograph equipment in the master bedroom? A. No, sir. Q. The models that you saw on the computer, did you recognize any of them as having been at the house? A. No. Q. The girls who stayed at the house, did any of them speak with a foreign accent? A. Yes. Q. Many of them? MR. CRITTON: Form. |
| 3456789012345678901 | MR. CRITTON: Form. BY MR. MERMELSTEIN: Q. Okay. There were photographs of naked women? A. Models. Q. And why do you say models? A. Because it was like a catalog so you have models, you know. Q. And what was your understanding as a source of these photos? A. I don't know, sir. It was just a curiosity on myself and it was it was none of my business but, you know, I just happen to see them there. Q. Did these girls appear very young to you? MR. CRITTON: Form. THE WITNESS: No, sir. They were young but not underage. BY MR. MERMELSTEIN: | 3
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| 2345678901234567890122345 | MR. CRITTON: Form. BY MR. MERMELSTEIN: Q. Okay. There were photographs of naked women? A. Models. Q. And why do you say models? A. Because it was like a catalog so you have models, you know. Q. And what was your understanding as a source of these photos? A. I don't know, sir. It was just a curiosity on myself and it was — it was none of my business but, you know, I just happen to see them there. Q. Did these girls appear very young to you? MR. CRITTON: Form. THE WITNESS: No, sir. They were young but not underage. BY MR. MERMELSTEIN: Q. Is there anything in particular that makes you draw that conclusion? A. Because they are developed, you know. | 3
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39 (Pages 150 to 153)

| | Page 166 | | Page 168 |
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| 1 | written down anywhere? | 1 | for now we'll call it a massage as well as |
| 2 | A. No. | 2 | anybody who brought that person over to the house, |
| 3 | Q. It's my understanding that C. and T. | 3 | they would both get paid cash. Are you familiar |
| 4 | either came to his house alone to visit with Mr. | 4 | with that? |
| 5 | Epstein or brought other girls in their age group | 5 | MR. CRITTON: Form. |
| 6 | to Mr. Epstein. | 6 | THE WITNESS: No. |
| 7 | Were you familiar with that type of | 7 | BY MR. EDWARDS: |
| 8 | recruitment process of girls bringing other girls? | 8 | Q. If C. brought another girl over to the |
| 9 | MR. CRITTON: Form. | 9 | house and C. stayed downstairs but this other girl |
| 10 | THE WITNESS: Yes. | 10 | went upstairs with Mr. Epstein, which one would |
| .1 | BY MR. EDWARDS: | 11 | you pay? |
| 2 | Q. Can you tell me more about what you know | 12 | A. I don't know because I was told who to |
| 3 | about girls bringing other girls that are | 13 | pay. |
| .4 | relatively the same age to come to Jeffrey | 14 | Q. And Sarah Kellen always told you? |
| 15 | Epstein's house and to use your words, have a good | 15 | A. Sarah told me pay so and so. |
| 16 | time? | 16 | Q. So if we were going to ask anybody else |
| 17 | MR. CRITTON: Form. | 17 | about the exact method in terms of who would get |
| 18 | THE WITNESS: It's hard to know who they | 18 | paid and for what, who would the people be? I |
| 19 | knew. But I think that was they feel | 19 | mean, other than Mr. Epstein who else could we ask |
| 20 | better themselves when they're in a group | 20 | these questions? |
| 21 | than going by themselves, but I don't know | 21 | A. Sarah. |
| 22 | somebody recruiting. | 22 | Q. Sarah Kellen? |
| 23 | BY MR. EDWARDS: | 23 | A. Yes. |
| 24 | Q. Okay. And you've talked about, at least | 24 | Q. She would know this? |
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| 25 | referred to yourself I believe to the police and | 25 | A. Yes. |
| | referred to yourself I believe to the police and | i | A. Yes. |
| 25 | referred to yourself I believe to the police and Page 167 | 25 | A. Yes. Page 169 |
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1 | referred to yourself I believe to the police and Page 167 as well today as a human ATM machine. Right? | 25
1 | A. Yes. Page 169 Q. What about Ghislaine Maxwell? |
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8 | referred to yourself I believe to the police and Page 167 as well today as a human ATM machine. Right? MR. CRITTON: Form. THE WITNESS: Something like that. I was supposed to carry cash at all times. BY MR. EDWARDS: Q. One of the primary reasons why you carried cash was to pay the girls in this age group of C. and T. for whatever happened at the house. Right? MR. CRITTON: Form. THE WITNESS: Yes. BY MR. EDWARDS: Q. That's a fair statement. Right? MR. CRITTON: Form. THE WITNESS: Yes. BY MR. EDWARDS: Q. Okay. And when C., let's use her for example, would bring somebody else to the house, did you pay C. as well as whomever she brought to the house, pay them both? A. No, I pay only one person. Q. Okay. My understanding, and tell me if | 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | Q. What about Ghislaine Maxwell? MR. CRITTON: Form. THE WITNESS: You're talking about the boss. I don't know. BY MR. EDWARDS: Q. To your knowledge was Ghislaine Maxwell aware of these girls that are in the age group of C. and T. coming to Jeffrey Epstein's house to have a good time? MR. CRITTON: Form. THE WITNESS: I have to say something. Mrs. Maxwell called me and told me not to ever discuss or contact her again in a threaten way. BY MR. EDWARDS: Q. When was this? A. Right after I left because I call one of the friends for a job and she told me this, but, you know, I feel intimidated and so I want to keep her out. Q. What exactly did she say? First of all, was this a telephone call? |

43 (Pages 166 to 169)

| | Page 238 | | Page 240 |
|---|---|--|---|
| 1 | Cab Company? | 1 | A. Nadia was the number one girlfriend for |
| 2 | A. West Palm Beach Taxi. No, it's not | 2 | Mr. Epstein. Very sweet girl, and she was always |
| 3 | Yellow. Could be Yellow, but I don't know. | 3 | she would come over to the house but different |
| 4 | Q. Would Mr. Epstein have the names or the | 4 | girls with her all the time. |
| 5 | list? | 5 | Q. Okay. But Nadia, that's somebody who |
| 6 | A. Probably. | 6 | lives in New York? |
| 7 | MR. CRITTON: Form. | 7 | A. Nadia, I believe, yes, her address is in |
| | | 8 | New York. |
| 8 | BY MR. EDWARDS: | _ | |
| 9 | Q. Anybody else? | 9 | Q. So how often would she stay at 358 El |
| 0 | A. Sarah. | 10 | Brillo? |
| 1 | Q. Sarah would have? | 11 | A. Very often. |
| 2 | A. Yes. | 12 | Q. Usually every time when Mr. Epstein was |
| 3 | Q. In addition to Mr. Epstein obviously | 13 | there? |
| 4 | knowing who's coming to and from the house, would | 14 | A. Yes, |
| 5 | Sarah also be familiar with the names of the girls | 15 | Q. And she would for the most time fly on |
| | | 16 | the plane with Mr. Epstein? |
| 6 | and who they were? | 17 | A. Yes. |
| 7 | A. Yes. | | |
| 8 | Q. In addition to Sarah and Mr. Epstein | 18 | Q. And it would be her and Mr. Epstein and |
| 9 | would Ghislaine Maxwell be familiar with the names | 19 | oftentimes some other girls? |
| 0 | of some of these girls? | 20 | A. Exactly. |
| 1 | MR. CRITTON: Form. | 21 | Q. Where some points I think earlier when |
| 2 | THE WITNESS: Yes. | 22 | Mr. Mermelstein was asking you questions where |
| 3 | BY MR. EDWARDS: | 23 | there was some confusion was we're talking about |
| 14 | Q. Are these names kept in a database in a | 24 | two different sets of girls, the girls that would |
| 25 | computer system? | 25 | come over and be labelled masseuses from the Palm |
| | 0 220 | | Page 241 |
| 1 | Page 239 A. Could be. | 1 | Beach area, and the girls that would fly on the |
| 1 | | 2 | plane with Mr. Epstein and Ms. Marcenacova. |
| 2 | MR. CRITTON: I'm sorry, did you say | • | So, what I'm asking you is what, if any, |
| 3 | could be? | 3 | |
| 4 | THE WITNESS: Yeah. | 4 | involvement did Nadia Marcenacova have with the |
| 5 | MR. CRITTON: Move to strike as | 5 | girls that would arrive and be labeled as |
| 6 | speculation. | 6 | masseuses behind closed doors with Mr. Epstein? |
| 7 | BY MR. EDWARDS: | 7 | MR. CRITTON: Form. |
| 8 | Q. When you say could be, why do you say | 8 | THE WITNESS: He was the second the |
| | | | |
| 9 | that? | 9 | first role was Sarah and she was always |
| | that? A Recause there were too many and they were | 9 | |
| 0 | A. Because there were too many and they were | 10 | Nadia is a very shy person so she will be in |
| 0 | A. Because there were too many and they were very organized and there is nothing you write on a | 10
11 | Nadia is a very shy person so she will be in the background. |
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2 | A. Because there were too many and they were very organized and there is nothing you write on a piece of paper. | 10
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12 | Nadia is a very shy person so she will be in the background. BY MR. EDWARDS: |
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3 | A. Because there were too many and they were very organized and there is nothing you write on a piece of paper. Q. When you say they were very organized, | 10
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the background.
BY MR. EDWARDS:
Q. Did you ever know of Nadia Marcenacova to |
| .0 .1 .2 .3 .4 | A. Because there were too many and they were very organized and there is nothing you write on a piece of paper. Q. When you say they were very organized, are we talking | 10
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14 | Nadia is a very shy person so she will be in
the background.
BY MR. EDWARDS:
Q. Did you ever know of Nadia Marcenacova to
engage in to be in the room with Mr. Epstein |
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5 | A. Because there were too many and they were very organized and there is nothing you write on a piece of paper. Q. When you say they were very organized, are we talking A. Mr. Epstein and Sarah. | 10
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15 | Nadia is a very shy person so she will be in the background. BY MR. EDWARDS: Q. Did you ever know of Nadia Marcenacova to engage in to be in the room with Mr. Epstein while any of these young girls were up there? |
| 0 1 2 3 4 5 | A. Because there were too many and they were very organized and there is nothing you write on a piece of paper. Q. When you say they were very organized, are we talking A. Mr. Epstein and Sarah. Q. Anybody else beside Mr. Epstein and | 10
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16 | Nadia is a very shy person so she will be in the background. BY MR. EDWARDS: Q. Did you ever know of Nadia Marcenacova to engage in to be in the room with Mr. Epstein while any of these young girls were up there? MR. CRITTON: Form. |
| 0 1 2 3 4 5 6 | A. Because there were too many and they were very organized and there is nothing you write on a piece of paper. Q. When you say they were very organized, are we talking A. Mr. Epstein and Sarah. | 10
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15 | Nadia is a very shy person so she will be in the background. BY MR. EDWARDS: Q. Did you ever know of Nadia Marcenacova to engage in to be in the room with Mr. Epstein while any of these young girls were up there? MR. CRITTON: Form. THE WITNESS: Yeah. |
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7 | A. Because there were too many and they were very organized and there is nothing you write on a piece of paper. Q. When you say they were very organized, are we talking A. Mr. Epstein and Sarah. Q. Anybody else beside Mr. Epstein and | 10
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7 | A. Because there were too many and they were very organized and there is nothing you write on a piece of paper. Q. When you say they were very organized, are we talking A. Mr. Epstein and Sarah. Q. Anybody else beside Mr. Epstein and Sarah, I guess beside Sarah that would do the scheduling to coordinate the times these girls | 10
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18 | Nadia is a very shy person so she will be in the background. BY MR. EDWARDS: Q. Did you ever know of Nadia Marcenacova to engage in to be in the room with Mr. Epstein while any of these young girls were up there? MR. CRITTON: Form. THE WITNESS: Yeah. |
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9 | A. Because there were too many and they were very organized and there is nothing you write on a piece of paper. Q. When you say they were very organized, are we talking A. Mr. Epstein and Sarah. Q. Anybody else beside Mr. Epstein and Sarah, I guess beside Sarah that would do the scheduling to coordinate the times these girls would come to the house? | 10
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19 | Nadia is a very shy person so she will be in the background. BY MR. EDWARDS: Q. Did you ever know of Nadia Marcenacova to engage in to be in the room with Mr. Epstein while any of these young girls were up there? MR. CRITTON: Form. THE WITNESS: Yeah. BY MR. EPSTEIN: Q. How often do you remember Nadia and Mr. |
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9 | A. Because there were too many and they were very organized and there is nothing you write on a piece of paper. Q. When you say they were very organized, are we talking A. Mr. Epstein and Sarah. Q. Anybody else beside Mr. Epstein and Sarah, I guess beside Sarah that would do the scheduling to coordinate the times these girls would come to the house? A. I'm sorry, anybody else you say? Q. Right, aside from Sarah. | 10
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21 | Nadia is a very shy person so she will be in the background. BY MR. EDWARDS: Q. Did you ever know of Nadia Marcenacova to engage in to be in the room with Mr. Epstein while any of these young girls were up there? MR. CRITTON: Form. THE WITNESS: Yeah. BY MR. EPSTEIN: Q. How often do you remember Nadia and Mr. Epstein being in the room with any of these young girls? |
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22 | Nadia is a very shy person so she will be in the background. BY MR. EDWARDS: Q. Did you ever know of Nadia Marcenacova to engage in to be in the room with Mr. Epstein while any of these young girls were up there? MR. CRITTON: Form. THE WITNESS: Yeah. BY MR. EPSTEIN: Q. How often do you remember Nadia and Mr. Epstein being in the room with any of these young girls? A. I would say most of the time. |
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23 | A. Because there were too many and they were very organized and there is nothing you write on a piece of paper. Q. When you say they were very organized, are we talking — A. Mr. Epstein and Sarah. Q. Anybody else beside Mr. Epstein and Sarah, I guess beside Sarah that would do the scheduling to coordinate the times these girls would come to the house? A. I'm sorry, anybody else you say? Q. Right, aside from Sarah. A. No, no. Q. And do you know what role, if any, Nadia | 10
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23 | Nadia is a very shy person so she will be in the background. BY MR. EDWARDS: Q. Did you ever know of Nadia Marcenacova to engage in to be in the room with Mr. Epstein while any of these young girls were up there? MR. CRITTON: Form. THE WITNESS: Yeah. BY MR. EPSTEIN: Q. How often do you remember Nadia and Mr. Epstein being in the room with any of these young girls? A. I would say most of the time. Q. Nadia would go up there too? |
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21 | A. Because there were too many and they were very organized and there is nothing you write on a piece of paper. Q. When you say they were very organized, are we talking A. Mr. Epstein and Sarah. Q. Anybody else beside Mr. Epstein and Sarah, I guess beside Sarah that would do the scheduling to coordinate the times these girls would come to the house? A. I'm sorry, anybody else you say? Q. Right, aside from Sarah. A. No, no. | 10
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22 | Nadia is a very shy person so she will be in the background. BY MR. EDWARDS: Q. Did you ever know of Nadia Marcenacova to engage in to be in the room with Mr. Epstein while any of these young girls were up there? MR. CRITTON: Form. THE WITNESS: Yeah. BY MR. EPSTEIN: Q. How often do you remember Nadia and Mr. Epstein being in the room with any of these young girls? A. I would say most of the time. |

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| Q. Would you know the name if I said it? A. Yeah. Q. Bill Riley? A. Yes. Q. Okay. Have you ever spoken with an investigator Paul Lavery? A. Could be, I'm not sure. Q. Okay. So Bill Riley came by your house personally? A. Yes. Q. And how long did you meet with him? A. Five minutes. He gave me his card, he gave me Mr. Critton telephone number, he said don't talk to Mr. Goldberger. Q. Did he tell you why you should call Mr. Critton? A. No. I assume that he was not on the case anymore, but I didn't ask questions but Q. You assumed that who wasn't on the case anymore? A. Mr. Goldberger, Jack Goldberger. Q. Okay. But what I'm asking you, I guess, is did this investigator, Mr. Riley, tell you why it was important for you to call any attorney that's associated with Mr. Epstein, why was that | A. We discuss he asked me a lot of questions, obviously he didn't know a lot of things about the case, and I told him who I was, what I did in the house. Q. He told you he didn't know a lot about the case? A. No, no, no. He asked me questions about so I got the feeling that Mr. Critton didn't know as much as other lawyers. Q. Okay. Did you tell him what you told us here today? A. No. He asked me tell the truth, you know, just go over there, you know, he advise me like you're on your own, Alfredo, just tell the truth, you know. He didn't give me any advice. He paid for my gas. Thank you very much. And that's it, you know. The main thing I wanted to have a lawyer on my side but then I keep going to the first instance when my wife told me you don't need a lawyer, and I'm here today to say that, I'm here, I'm speaking the truth. Q. Okay. You mentioned there were five or six computers in the house? A. Yes. |
|--|--|
| important? A. He didn't say that. He didn't say that. He just said that get in touch and that's it. Because I said what am I going to do, because I said I thought this was you know, but I didn't know I was going to be subpoena. And like I said in the beginning of this deposition, I don't have an attorney so I don't have money, first of all, to pay for an attorney. First of all, I don't think I'm in trouble, but every time you hear high powered lawyers you feel intimidated so I said, listen, what am I going to do, and that was my basic question. Q. Okay. So then you spoke with somebody at Mr. Critton's office and arranged to meet with him personally? A. Yes. I called his secretary and we sit down with his assistant, the three of us. Q. So it was Mr. Critton, yourself, and somebody else? A. Yes. Q. And you sat down for another two hour period of time? A. Yes. Q. And what did you go over in that meeting? | Page 253 1 Q. And do you know what happened to the 2 computers? 3 A. No. 4 Q. You don't know where they are? 5 A. (Shakes head.) 6 Q. Nobody has told you? 7 A. No. 8 Q. You also mentioned there were photographs 9 in the house? 10 A. In the computers in the files. 11 Q. Okay. But there were also still 12 photographs around the house? 13 A. Oh yes, yes. 14 Q. Some of the girls have made the 15 allegation that there were photographs of them 16 nude in the house. Do you remember seeing that? 17 A. In the closet, yeah, in a mosaic. It was 18 one frame with probably 15 pictures, small 19 pictures. 20 MR. CRITTON: Repeat the question back. 21 BY MR. EDWARDS: 22 Q. Okay. Some of the girls that have 23 lawsuits against Mr. Epstein with allegations 24 similar to the allegations that C. and T. have 25 made, which is that they were underage when Mr. |

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| | Page 254 | | Page 256 |
|---|--|---|---|
| 1 | Epstein was engaging in sex or sex acts with them, | 1 | those photos? |
| 2 | also say that they have seen pictures of | 2 | A. One was a Columbian lady and one was |
| 3 | themselves in frames in Mr. Epstein's house naked. | 3 | one from Spain, beautiful girls, that, you know, |
| 4 | A. In his closet. | 4 | but they were not not the ones the girls we're |
| 5 | Q. Other than the picture and these are | 5 | talking about here. |
| | girls who are making the allegation that they were | 6 | Q. Okay. When you were hired were you hired |
| 6 | | 7 | by Mr. Epstein or were you hired by one of his |
| 7 | underage and there were pictures of them nude in | | |
| 8 | his house. | 8 | companies? |
| 9 | A. I didn't see pictures of C. there. | 9 | A. Mrs. Maxwell. |
| .0 | Q. I'm not talking about C. I'm saying | 10 | Q. So it was was it a company owned by |
| 1 | other girls that were underage or have made | 11 | Mrs. Maxwell? |
| 12 | allegations that they have seen pictures of | 12 | A. Not directly. My paycheck was Jeffrey |
| 13 | themselves in Mr. Epstein's house. | 13 | Epstein. I mean, I was hired by Mr. Epstein |
| 4 | MR. CRITTON: Form. | 14 | but |
| 15 | BY MR. EDWARDS: | 15 | Q. Okay. I just understood you to say you |
| 6 | Q. Where would those photos have been, or | 16 | were hired by Mrs. Maxwell. |
| | did you see them? | 17 | A. Exactly, she told me you're hired but |
| 17 | | 18 | you're going to get paid by Mr. Epstein. |
| 8. | A. Yes, I see them inside his closet. | 19 | Q. And he wrote you personal checks? |
| .9 | Q. It's one mosaic? | | |
| 20 | A. Yes, one mosaic. | 20 | |
| 1 | Q. Other than there did you see any of these | 21 | Jeffrey Epstein Companies. |
| 2 | pictures of young girls nude anywhere else in the | 22 | Q. It was out of his company? |
| 23 | house? | 23 | A. Yes. |
| 24 | MR. CRITTON: Form. | 24 | Q. Which company; do you know? |
| | THE WITNESS: Nude with an art, yes, but | 25 | A REC Mandiana Arramana This work to the Night |
| 25 | THE WITHESS. Nucle with all art, yes, but | 25 | A. 456 Madison Avenue. It's next to the New |
| 25
 | | 25 | |
| | Page 255 | | Page 257 |
| 1 | Page 255
not pornography. You know, I saw them, they | 1 | Page 257
York Palace now. |
| 1 2 | Page 255
not pornography. You know, I saw them, they
were all over the place. For instance, in | 1 2 | York Palace now. Q. The name of the company is 456 Madison |
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not pornography. You know, I saw them, they
were all over the place. For instance, in
the back only showing part of the rear, you | 1
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3 | York Palace now. Q. The name of the company is 456 Madison Avenue? |
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4 | Page 255 not pornography. You know, I saw them, they were all over the place. For instance, in the back only showing part of the rear, you know. | 1
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4 | York Palace now. Q. The name of the company is 456 Madison Avenue? A. No, no, it's I got it on the tip of my |
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5 | Page 255 not pornography. You know, I saw them, they were all over the place. For instance, in the back only showing part of the rear, you know. BY MR. EDWARDS: | 1
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5 | Page 257 York Palace now. Q. The name of the company is 456 Madison Avenue? A. No, no, it's I got it on the tip of my tongue. Something like Caribbean or island |
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5 | Page 255 not pornography. You know, I saw them, they were all over the place. For instance, in the back only showing part of the rear, you know. | 1
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65 (Pages 254 to 257)

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Page 268
                                                           Page 266
                                                                            THE STATE OF FLORIDA,
     BY MR. LANGINO:
                                                                                                            )
         Q. Are you currently in fear of Mr. Epstein?
                                                                       2
                                                                            COUNTY OF DADE.
2
                                                                       3
3
         A. Not at this particular moment but it's
                                                                       4
     something I have to be worry about, yes.
                                                                                    I, the undersigned authority, certify
                                                                       5
         Q. Are you personally afraid of criminal
                                                                            that ALFREDO RODRIGUEZ personally appeared before
                                                                       6
 6
     prosecution?
                                                                            me on the 29th day of July, 2009 and was duly
 7
         A. No.
                                                                       8
8
         Q. Do you believe that you did anything
                                                                       9
9
     illegal?
                                                                      10
                                                                                    WITNESS my hand and official seal this
10
         A. Illegal, no.
                                                                            31st day of July, 2009.
                                                                      11
             MR. LANGINO: I have no further
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12
           questions. Thank you.
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13
             MR. CRITTON: We're going to break in
                                                                      14
           about 15 minutes. Do you want to start and
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           go for 15 minutes or do you want to -- it's
15
                                                                                     MICHELLE PAYNE, Court Reporter
16
           up to you.
                                                                      16
                                                                                    Notary Public - State of Florida
17
             MS. EZELL: I'll start.
                                                                      17
18
             MR. WILLITS: When are we going to quit,
                                                                      18
19
           folks?
                                                                      19
20
             MR. CRITTON: In 15 minutes.
                                                                      20
             THE VIDEOGRAPHER: Might as well change
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                                                                      21
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           tapes.
             MR. EDWARDS: Bob has to get back so
23
                                                                      23
24
           we've agreed we're going to come back some
                                                                      24
                                                                      25
25
           other time.
                                                                                                                                   Page 269
                                                            Page 267
                                                                                   CERTIFICATE
             MR. WILLITS: Why don't we just stop now?
 1
 2
             MS. EZELL: Okay.
                                                                           The State Of Florida,
                                                                           County Of Dade.
 3
             MR. EDWARDS: Rather than you start.
 4
             MS. EZELL: Yeah, I won't get very far.
                                                                           I, MICHELLE PAYNE, Court Reporter and
Notary Public in and for the State of Florida at
 5
             MR. EDWARDS: Sorry to do this with you,
                                                                           large, do hereby certify that I was authorized to and did stenographically report the videotaped
 6
           we didn't finish.
                                                                           deposition of ALFREDO RODRIGUEZ; that a review of
 7
             MR. CRITTON: So we're stopped?
                                                                          the transcript was requested; and that the foregoing pages, numbered from 1 to 269,
 8
             MR. EDWARDS: We're stopped.
                                                                           inclusive, are a true and correct transcription of
 9
             THE VIDEOGRAPHER: Off the record.
                                                                           my stenographic notes of said deposition
10
             (Thereupon, the videotaped deposition was
                                                                             I further certify that said videotaped
                                                                           deposition was taken at the time and place
      adjourned at 5:30 p.m.)
11
                                                                           hereinabove set forth and that the taking of said
                                                                       11
12
                                                                           videotaped deposition was commenced and completed
                                                                           as hereinabove set out.
13
                                                                                I further certify that I am not an
                                                                       13
14
                                                                           attorney or counsel of any of the parties, nor am I a relative or employee of any attorney or
15
                                                                       14
                                                                           counsel of party connected with the action, nor am
16
                                                                       15
                                                                           I financially interested in the action.
                                                                                 The foregoing certification of this
17
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                                                                           transcript does not apply to any reproduction of
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                                                                           the same by any means unless under the direct
                                                                           control and/or direction of the certifying
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                                                                                 DATED this 31st day of July, 2009.
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                                                                                 MICHELLE PAYNE, Court Reporter
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68 (Pages 266 to 269)

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Page 270
               UNITED STATES DISTRICT COURT
 1
               SOUTHERN DISTRICT OF FLORIDA
 2
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     JANE DOE NO. 2,
                            CASE NO: 08-CV-80119
 4
        Plaintiff,
 5
     Vs.
     JEFFREY EPSTEIN,
 6
         Defendant.
 8
     JANE DOE NO. 3,
                             CASE NO: 08-CV-80232
 9
        Plaintiff,
                                             CONDENSED
10
     Vs.
11
     JEFFREY EPSTEIN,
12
         Defendant.
13
     JANE DOE NO. 4,
                             CASE NO: 08-CV-80380
14
     Plaintiff,
15
16
     Vs.
17
     JEFFREY EPSTEIN,
18
         Defendant.
19
                           CASE NO: 08-CV-80381
     JANE DOE NO. 5,
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         Plaintiff,
21
     VS
22
     JEFFREY EPSTEIN,
23
         Defendant.
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25
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Kress Court Reporting, Inc. 305-866-7688 7115 Rue Notre Dame, Miami Beach, FL 33141

NON PARTY (VR) 000315

| Page 1 JANE DOE NO. 6, CASE NO: 08-CV-80994 2 Plaintiff, 3 Vs. 4 JEFFREY EPSTEIN, 5 Defendant. | Page 273 IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA CASE NO. 502008CA037319XXXXMB AB |
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| 5 Defendant. 6 JANE DOE NO. 7, CASE NO: 08-CV-80993 7 Plaintiff, 8 Vs. 9 JEFFREY EPSTEIN, 10 Defendant. 11 12 C.M.A., CASE NO: 08-CV-80811 13 Plaintiff, 14 Vs. 15 JEFFREY EPSTEIN, 16 Defendant. 17 JANE DOE, CASE NO: 08-CV-80893 18 Plaintiff, 19 Vs. 20 JEFFREY EPSTEIN, 21 | |
| Defendant. 22 23 24 25 | taken on behalf of the Plaintiffs pursuant to a Re-Notice of Taking Continued Videotaped Deposition (Duces Tecum) |
| Page 1 JANE DOE NO. II, CASE NO: 08-CV-80469 2 Plaintiff, 3 Vs. 4 JEFFREY EPSTEIN, 5 Defendant. 6 JANE DOE NO. 101 CASE NO: 08-CV-80591 7 Plaintiff, 8 Vs. 9 JEFFREY EPSTEIN, 10 Defendant. 11 JANE DOE NO. 102, CASE NO: 08-CV-80656 13 Plaintiff, 14 Vs. 15 JEFFREY EPSTEIN, | 1 APPEARANCES: 2 3 MERMELSTEIN & HOROWITZ, P.A. BY: ADAM HOROWITZ, ESQ. 4 18205 Biscayne Boulevard Suite 2218 5 Miami, Florida 33160 Attorney for Jane Doe 2, 3, 4, 5, 6 6, and 7. 7 8 ROTHSTEIN ROSENFELDT ADLER BY: BRAD J. EDWARDS, ESQ., and CARA HOLMES, ESQ. Las Olas City Centre 10 Suite 1650 401 East Las Olas Boulevard 11 Fort Lauderdale, Florida 33301 Attorney for Jane Doe and E.W. And L.M. 12 And L.M. 13 14 PODHURST ORSECK BY: KATHERINE W. EZELL, ESQ. 15 25 West Flagler Street Suite 800 16 Miami, Florida 33130 |
| 16 Defendant. 17 18 19 20 21 22 23 24 25 | Attorney for Jane Doe 101 and 102. 17 18 LEOPOLD-KUVIN 19 BY: ADAM J. LANGINO, ESQ. 2925 PGA Boulevard 20 Suite 200 Palm Beach Gardens, Florida 33410 21 Attorney for B.B. 22 23 24 25 |

2 (Pages 271 to 274)

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| ĺ | Page 299 | | Page 301 |
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| 1 | A. I don't remember, Ma'am. He came from | 1 | video, even phones. |
| 2 | New Albany, Ohio. | 2 | Q. Would he also repair the televisions if |
| 3 | Q. From New | 3 | they needed work? |
| 4 | A. New Albany, Ohio. | 4 | A. No. |
| 5 | Q. New Albany, Ohio. Did he have his own | 5 | Q. No. Did you have any kind of intercom |
| 6 | business? | 6 | system in the house? |
| 7 | A. No, he worked for Mr. Epstein. He will | 7 | A. Yes, ma'am. |
| 8 | maintain all the computers. | 8 | Q. And what kind of system was that? |
| 9 | Q. Was he there everyday? | 9 | A. It was standard office equipment, Lucid |
| 10 | A. No, ma'am. | 10 | Technologies maybe, but it was an intercom like we |
| 11 | Q. Do you know whether at that time Mr. | 11 | using right now. |
| 12 | Epstein had an office in Palm Beach? | 12 | MS. EZELL: Just let the record reflect |
| 13 | A. Not outside the house, no. | 13 | that the witness pointed to the telephone on |
| 14 | Q. Do you have any knowledge of whether or | 14 | the table that has a speaker phone. |
| 15 | not the video equipment was and I don't know | 15 | THE WITNESS: Yes, ma'am. |
| 16 | | 16 | BY MS. EZELL: |
| | the technical term, forgive me, but was it the | | |
| 17 | kind of equipment that would record for a certain | 17 | Q. And did you use that in your work? |
| 18 | amount of time and then record over that film? | 18 | A. Yes, ma'am. |
| 19 | A. I don't know. | 19 | Q. And what did you use it for? |
| 20 | MR. CRITTON: Form. | 20 | A. Mr. Epstein used to page me when he |
| 21 | BY MS. EZELL: | 21 | needed me. |
| 22 | Q. You don't know? | 22 | Q. Did you have one of those phones in the |
| 23 | A. No, ma'am. | 23 | kitchen? |
| 24 | MR. CRITTON: Just for clarification, I | 24 | A. Yes, ma'am. |
| 25 | may have misunderstood, but I thought he | 25 | Q. And was there one out in the staff house |
| | Page 300 | | Page 302 |
| 1 | said he didn't even know the video equipment | 1 | as well? |
| 2 | existed until he read the FBI report. | 2 | A. Yes, ma'am. |
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| 3 | MS. EZELL: He said he didn't know that | 3 | Q. Do you know where others were in the |
| 4 | MS. EZELL: He said he didn't know that it was upstairs and downstairs, I believe. | 3
4 | Q. Do you know where others were in the house? |
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5 | MS. EZELL: He said he didn't know that it was upstairs and downstairs, I believe. MR. CRITTON: I thought he said he didn't | 3
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7 | Q. Do you know where others were in the house? A. Probably have like 15 phones. We used to have three in the staff house, one in the cabana, two in the master bedroom, one in each room, |
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9 (Pages 299 to 302)

| I | Dags 202 | | Page 20 |
|--|--|--|--|
| 1 | Page 303 names and phone numbers? | 1 | Page 30 computer? |
| 15000,7 | | 2 | MR. CRITTON: Form. |
| 2 | MR. CRITTON: Form. | | |
| 3 | THE WITNESS: Yes, ma'am. | 3 | THE WITNESS: Yes, ma'am. |
| 4 | BY MS. EZELL: | 4 | BY MS. EZELL: |
| 5 | Q. Do you know if she kept pictures of the | 5 | Q. And did she generally have phone numbers |
| 6 | girls on the computer? | 6 | for those girls? |
| 7 | A. Yes, she did. | 7 | A. Yes, ma'am. |
| 8 | Q. And you know that as well because you | 8 | Q. And were they generally pictures of the |
| 9 | happen to see them? | 9 | girls? |
| 10 | A. Yes, ma'am. | 10 | MR, CRITTON: Form. |
| 11 | MR, CRITTON: Form to the last two | 11 | THE WITNESS: No, ma'am. |
| 12 | questions. | 12 | BY MS. EZELL: |
| 13 | BY MS. EZELL; | 13 | Q. And did Ms. Maxwell have a list of the |
| | | 1 | The state of the s |
| 14 | Q. Were they similar to the pictures that | 14 | girls who came to give massages? |
| 15 | Ms. Kellen had on her computer? | 15 | MR. CRITTON: Form. |
| 16 | MR. CRITTON: Form. | 16 | THE WITNESS: Yes, ma'am. |
| 17 | THE WITNESS: Yes, ma'am. | 17 | BY MS. EZELL: |
| 18 | BY MS. EZELL: | 18 | Q. Did she have telephone numbers generally? |
| 9 | Q. Did the pictures that they kept there | 19 | A. Yes, ma'am. |
| 20 | look like pictures that were posed? | 20 | MR. CRITTON: Form. |
| 21 | A. They were more casual. | 21 | BY MS. EZELL: |
| 22 | Q. Did they look as though the person being | 22 | Q. Were there pictures on her computer of |
| 23 | photographed knew that they were being | 23 | the girls who came to give massages? |
| 24 | photographed? | 24 | MR. CRITTON: Form. |
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25 | MR. CRITTON: Form. | 25 | BY MS. EZELL: |
| 23 | MR. CRITTON. FORM. | 23 | DT MS. EZELL. |
| | Page 304 | | Page 30 |
| 1 | THE WITNESS: No, ma'am. | 1 | Q. Ms. Maxwell I'm talking about. |
| 2 | BY MS. EZELL: | 2 | A. Yes, ma'am. |
| 3 | Q. And what can you tell me about that, what | 3 | Q. And were those pictures the more casual |
| 4 | lead you to draw that conclusion? | 4 | ones that you described when I asked whether or |
| 5 | A. They were probably taken in parties in | 5 | not the subject looked as though she knew she was |
| 6 | big reception or banquet. | 6 | being photographed? |
| 7 | MR. CRITTON: Let me offer as a | 7 | MR. CRITTON: Form. |
| 8 | suggestion, not that you have to accept or | 8 | THE WITNESS: I'm sorry, can you repeat? |
| 9 | that you would, you're using the term young | 9 | BY MS. EZELL: |
| - | | - 50 | |
| Λ | girls generically, he has probably seen | 10
11 | Q. Yeah. The pictures of the young girls
who came to the house to give massages that were |
| | manus manus sasuna airi- beaus some an | 11 | who came to the house to dive massages that were |
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10 (Pages 303 to 306)

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Page 471
         THE STATE OF FLORIDA,
          COUNTY OF DADE.
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                      I, the undersigned authority, certify
  6
         that ALFREDO RODRIGUEZ personally appeared before
  7
         me on the 7th day of August, 2009 and was duly
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                      WITNESS my hand and official seal this
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         18th day of August, 2009.
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                       MICHELLE PAYNE, Court Reporter
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                      Notary Public - State of Florida
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                                                                                             Page 472
                  CERTIFICATE
      The State Of Florida,
      County Of Dade.
      I, MICHELLE PAYNE, Court Reporter and
Notary Public in and for the State of Florida at
 5

    large, do hereby certify that I was authorized to
and did stenographically report the deposition of
ALFREDO RODRIGUEZ; that a review of the transcript
 was not requested; and that the foregoing pages,
8 numbered from 270 to 472, inclusive, are a true
      and correct transcription of my stenographic notes
    of said deposition.

I further certify that said deposition was
      taken at the time and place hereinabove set forth
     and that the taking of said deposition was commenced and completed as hereinabove set out.
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              I further certify that I am not an
13 attorney or counsel of any of the parties, nor am
1 a relative or employee of any attorney or
     counsel of party connected with the action, nor am I financially interested in the action.
15
               The foregoing certification of this

    transcript does not apply to any reproduction of
the same by any means unless under the direct
    control and/or direction of the certifying

18
              DATED this 18th day of August, 2009.
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              MICHELLE PAYNE, Court Reporter
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52 (Pages 471 to 472)

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NON PARTY (VR) 000366

United States District Court For The Southern District of New York

Giuffre v. Maxwell 15-cv-07433-RWS Ghislaine Maxwell's Privilege Log Amended as of August 1, 2016

***Per Local Rule 26.2, the following privileges are asserted pursuant to British law, Colorado law and NY law.

| Log ID | DATE | DOC.
TYPE | BATES
| FROM | ТО | CC | RELATIONSHIP
OF PARTIES | SUBJECT
MATTER | PRIVILEGE |
|--------|----------------------------|--------------|---------------|---------------------|---|-----------------|------------------------------|--------------------------------|-----------------|
| 1. | 2011.03.15 | E-Mails | 1000-
1013 | Ghislaine Maxwell | Brett Jaffe, Esq. | | Attorney / Client | Communication re: legal advice | Attorney-Client |
| 2. | 2011.03.15 | E-Mails | 1014-
1019 | Brett Jaffe, Esq. | Ghislaine Maxwell | | Attorney / Client | Communication re: legal advice | Attorney-Client |
| 3. | 2015.01.02 | E-Mails | 1020-
1026 | Ross Gow | Ghislaine Maxwell | | Attorney Agent /
Client | Communication re: legal advice | Attorney-Client |
| 4. | 2015.01.02 | E-Mail | 1024-
1026 | Ghislaine Maxwell | Ross Gow | | Attorney Agent /
Client | Communication re: legal advice | Attorney-Client |
| 5. | 2015.01.02 | E-Mail | 1027-
1028 | Ross Gow | Ghislaine Maxwell | Brian
Basham | Attorney Agent /
Client | Communication re: legal advice | Attorney-Client |
| 6. | 2015.01.06 | E-Mail | 1029 | Ghislaine Maxwell | Jeffrey Epstein | | Common Interest | Communication re: legal advice | Common Interest |
| 7. | 2015.01.06 | E-Mail | 1030-
1043 | Ghislaine Maxwell | Jeffrey Epstein,
Alan Dershowitz, Esq. | | Attorney / Client | Communication re: legal advice | Common Interest |
| 8. | 2015.01.10 | E-Mail | 1044 | Ghislaine Maxwell | Philip Barden, Esq.,
Ross Gow | | Attorney / Client | Communication re: legal advice | Attorney-Client |
| 9. | 2015.01.10 | E-Mail | 1045-
1051 | Ghislaine Maxwell | Philip Barden, Esq. | | Client / Attorney | Communication re: legal advice | Attorney-Client |
| 10. | 2015.01.09 -
2015.01.10 | E-Mails | 1052-
1055 | Ross Gow | Philip Barden, Esq. | G.
Maxwell | Agent / Attorney /
Client | Communication re: legal advice | Attorney-Client |
| 11. | 2015.01.11 | E-Mail | 1055-
1058 | Ghislaine Maxwell | Jeffrey Epstein | | Common Interest | Communication re: legal advice | Common Interest |
| 12. | 2015.01.11 | E-Mail | 1055-
1058 | Philip Barden, Esq. | Ross Gow | G.
Maxwell | Attorney / Agent /
Client | Communication re: legal advice | Attorney-Client |
| 13. | 2015.01.11 | E-Mail | 1056-
1058 | Philip Barden, Esq. | Ghislaine Maxwell | Ross
Gow | Attorney / Agent /
Client | Communication re: legal advice | Attorney-Client |

| 14. | 2015.01.11 - | E-Mails | 1059- | Jeffrey Epstein | Ghislaine Maxwell | | Common Interest | Communication | Common Interest Privilege |
|-----|--------------|-----------------------|---------------|--|--|-------|-----------------------------------|---|--|
| | 2015.01.17 | | 1083 | | | | - | re: legal advice | |
| 15. | 2015.01.13 | E-Mail | 1067-
1073 | Ghislaine Maxwell | Jeffrey Epstein | | Common Interest | Communication re: legal advice | Common Interest Privilege |
| 16. | 2015.01.13 | E-Mail | 1073 | Philip Barden, Esq. | Martin Weinberg, Esq. | | Common Interest | Communication | Common Interest Privilege |
| 10. | 2015.01.15 | E-Man | 1069- | Philip Barden, Esq. | Martin Weinberg, Esq. | | Common Interest | re: legal advice | Common Interest Privilege |
| | | | 1076-
1079 | | | | | | |
| 17. | 2015.01.13 | E-Mails | 1068- | Philip Barden, Esq. | Ghislaine Maxwell | Mark | Attorney / Client | Communication | Attorney-Client |
| | | | 1069, | | | Cohen | | re: legal advice | |
| | | | 1074-
1076 | | | | | | |
| 18. | 2015.01.21 | E-Mail | 1088- | Ross Gow | Philip Barden, Esq., Ghislaine | | Agent / Attorney / | Communication | Attorney-Client |
| 10. | 2010.01.21 | L IVIUII | 1090 | Ross Cow | Maxwell | | Client | re: legal advice | Theomey enem |
| 19. | 2015.01.21 - | E-Mails | 1084- | Jeffrey Epstein | Ghislaine Maxwell | | Common Interest | Communication | Common Interest Privilege |
| | 2015.01.27 | | 1098 | , 1 | | | | re: legal advice | |
| 20. | 2015.01.21- | E-Mails | 1099 | Ghislaine Maxwell | Jeffrey Epstein | | Common Interest | Communication | Common Interest Privilege |
| | 2015.01.27 | | | | | | | re: legal advice | |
| 21. | 2015.04.22 | E-mail | 7 pages | Jeffrey Epstein | Ghislaine Maxwell | | Common Interest | Forwarding message from Martin Weinberg, labeled "Attorney- Client Privilege" with attachment | Common Interest Privilege |
| 22. | Various | E-mails | | Agent of Haddon,
Morgan & Foreman;
Laura Menninger | Agent of Haddon, Morgan & Foreman; Laura Menninger | | Agent of attorney and
Attorney | Attorney work product | Attorney Work Product |
| 23. | Various | E-mails | | Mary Borja; Laura
Menninger | Mary Borja; Laura Menninger | | Attorney Work
Product | Attorney work product | Attorney Work Product |
| 24. | 2015.10.21 - | E-mail | | Darren Indyke; Laura | Darren Indyke; Laura Menninger | | Attorneys for parties | Common Interest | Attorney Work Product; |
| | 2015.10.22 | chain with attachment | | Menninger | | | to Common Interest Agreement | Agreement | Common Interest Privilege |
| 25. | 2015.01.06 | | | | | | Attorney/Client | Document prepared by Ghislaine Maxwell at the direction of Philip Barden | Attorney Work Product;
Attorney-Client
Communication |

| 26. | 2015.01.23 | | Attorney/Cl | lient | Document | Attorney Work Product; |
|-----|------------|--|-------------|-------|---------------------|------------------------|
| | | | | | prepared by | Attorney-Client |
| | | | | | Ghislaine | Communication |
| | | | | | Maxwell at the | |
| | | | | | direction of Philip | |
| | | | | | Barden | |

| Case 18-2868, Document 283, 08/09/2019, 2628241, Page398 of 883 |
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| EARIDII 23 |
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Expert Report of Professor Terry Coonan, J.D.

Pursuant to Federal Rule of Civil Procedure 26(a)(2)(B)

Giuffre v. Maxwell Case No. 15-cv-07433-RWS international commercial dimensions of the sex trafficking scheme recounted by Ms. Giuffre. It is both factually and legally correct to characterize what Ms. Giuffre experienced as victimization in a sex trafficking conspiracy.

Conclusion 4

Virginia Roberts Giuffre's account appears credible and consistent in its most salient parts with the testimony of other witnesses and with contemporary trends in U.S. sex trafficking.

The description of exploitation recounted by Ms. Giuffre, while not the most common sex trafficking scenario (many cases involve even more brutal forms of pimp-driven prostitution) nonetheless is quite consistent with larger patterns of commercial sexual exploitation. The conspiracy in this case was premised upon the exploitation of minors and young women who seem to have had certain identifiable vulnerabilities that rendered them prone to exploitation. The criminal scheme that emerges from the depositions and police reports involved a very calculated pattern of recruiting, grooming, and an attempt to "normalize" the repeated exploitation of its victims.

While the accounts of witnesses vary in some of their details, the essential elements of a sex trafficking conspiracy clearly emerge when viewed in the totality of the circumstances that are recounted in the case record. Ms. Giuffre refers to herself at times as a "sex slave." This is not factually incorrect, given her experiences, though current U.S. law might prefer to characterize her as a victim of sex trafficking. Popular understandings of the term "sex slave" might still connote images of violent pimps, white slavery, or of victims chained to a bed in a brothel in the minds of some people. To call Ms. Giuffre a victim of sex trafficking would however very accurately convey the reality that she along with a great many other victims of contemporary forms of slavery are often exploited by the "invisible chains" of fraud and psychological coercion.

Expert Witness Report of

Dr. Bernard J. Jansen Professor College of Information Sciences and Technology The Pennsylvania State University

Regarding the case of:

Virginia Giuffre v. Ghislaine Maxwell

(U.S. District Court for the Southern District of New York)

9 September 2016

I. INTRODUCTION

1. I have been retained by the law firm of Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L. to provide expert analysis and opinion on behalf of Ms. Virginia Giuffre in VIRGINIA L. GIUFFRE, Plaintiff, v. GHISLAINE MAXWELL, Defendant. CASE NO. 1:15-cv-07433, which is pending in the United States District Court Southern District of New York.

II. QUALIFICATIONS

- 2. I am a tenured, full professor at the College of Information Sciences and Technology at The Pennsylvania State University, University Park, Pennsylvania, where I have been employed since 2001. I am the Director of the Information Searching and Learning Laboratory at the College of Information Sciences and Technology at The Pennsylvania State University. I am also a principal scientist at the Qatar Computing Research Institute. I was a Senior Fellow at the Pew Internet & American Life Project, which is part of the Pew Research Center, from 2010 through 2012. I was also a University Expert at the National Ground Intelligence Center from 2011 through 2014. Prior to my employment at The Pennsylvania State University, I was a Lecturer in the Computer Science Program at the University of Maryland (Asian Division) for 1 year. Before that I was an Assistant Professor and Lecturer in the Department of Electrical Engineering and Computer Science at the United States Military Academy, a.k.a. West Point, for 3 years.
- 3. In addition to my academic credentials, my professional experience includes 20 years of practice in the U.S. military, working primarily in a variety of technology-related and leadership positions.
- 4. I have authored approximately 250 academic publications, focusing on the areas of Web data, digital analytics, Web analytics, Web searching, Web search engines, social media analytics, and related areas. Approximately 200 of my publications address aspects of search

analytics, Web analytics, online advertising, search engines, or Web searching. My recent research work focuses on online news analytics, which is the investigation of the online qualitative and quantitative attributes of news stories, along with other digital content. I am also the editor-in-chief of the academic journal <u>Information Processing and Management</u>, and I was previously the editor-in-chief for 5 years of the academic journal, <u>Internet Research</u>. I have authored, co-authored, or co-edited four books, including <u>Web Search: Public Searching of the Web</u> (2007), <u>Understanding User – Web Interactions via Web Analytics</u> (2009) and <u>Understanding Sponsored Search</u> (2011). A copy of my complete curriculum vitae, which includes a list of all publications I have authored in the past 10 years, is attached as **Appendix A**.

- 5. My fields of professional expertise include web analytics, search engines, web searching, social media, online advertising, and related areas. In the course of my academic career, I have worked with a variety of search engines and information searching applications in order to understand user searching behavior on the Web and other environments. For example, as part of my Master's program in computer science, I designed and coded a text-based search engine. For my Doctorate program in computer science, I developed a program interface for Web search engines and implemented it on the Gigabyte search engine. In subsequent research, I have worked with the Microsoft Internet Information Services (IIS) and Verity commercial searching systems.
- 6. Concerning user searching behaviors on the Web using web analytics, I have worked directly with real-user searching data from several search engines, including AOL, Alta Vista, Dogpile, Excite, and MSN Live. I've also analyzed web data of visitor traffic and other attributes from a variety of websites and social media platforms. I've analyzed real-user data from online search marketing campaigns and user referral traffic to websites. I have conduct research and teaching concerning aspects of websites and social media platforms, including keyword

advertising. I've developed web analytics models and processes for analysis of business goals, and I have used web analytics data and commercial tools in both my research and teaching. I've also conducted other research on user searching and related online behaviors. I have advised governmental agencies and companies in consulting and expert witnessing matters. A list of cases in which I have testified as an expert in deposition or trial in the past four years is attached as **Appendix B**. I am being compensated for my work on this case at the rate of \$300 per hour.

III. ASSIGNMENT AND MATERIALS CONSIDERED

- 7. In providing my expert opinion, I have been asked to respond to the following question:
- 8. What is the dissemination of the statements from Ms. Maxwell referring to Ms. Giuffre's declarations as "untrue" and "lies" from when the statements were made on 2 January 2015 to the date that I filed this report?
- 9. For brevity, I refer to references to the statements denoting Ms. Giuffre's declarations as "untrue" and "lies", any related accounts referring to those original statements, or similar statements from Ms. Maxwell or her representatives referring to Ms. Giuffre as the statements made against Ms. Giuffre, the statements from Ms. Maxwell's message, or the message from Mr. Gow¹.
- 10. My analysis is based on my experience, training, knowledge, and education and is formed through the application of that experience, training, knowledge, and education in the principles of web data collection, web analytics, web search, search engines, web sites, web traffic analysis, and related market analysis.
 - 11. The materials that I considered in preparing this report are listed in **Appendix C**.

¹ See, para. 30 and 32, Complaint, VIRGINIA L. GIUFFRE, Plaintiff, v. GHISLAINE MAXWELL, Defendant. CASE NO. 1:15-cv-07433.

IV. SUMMARY OF OPINIONS

- 12. Based on my research and analysis in connection with this assignment, which is described in more detail in the body of this report, along with my own experience, training, knowledge, and education as stated below, I have reached the following opinion:
- 13. The statements made against Ms. Giuffre have been disseminated to at least 115 online media or other sites in 178 separate stories or articles with a combined 66,909,965 potential unique visitors since 2 January 2015 to the date that I filed this report, inclusive.
- 14. This is a conservative estimate, and it is more likely than not, the statements made by Ms. Maxwell against Ms. Giuffre have received wider dissemination due to factors such as:
- a. I used a set of online websites to measure dissemination, and it is reasonable that I have not located all references to the statements made against Ms. Giuffre on every website by the time of the submission of this report.
- b. I examined only online sources referencing the statements made against Ms. Giuffre and not print or broadcast media dissemination of the statements made against Ms. Giuffre.
- c. I have not attempted to measure face-to-face dissemination of articles containing the statements against Ms. Giuffre.
- d. I do not have access to certain online sources where articles containing the statements against Ms. Giuffre may have been disseminated (e.g., email messages, personal social media messages, articles behind firewalls, etc.).
- e. There are possibly sites that have hosted the statements made against Ms. Giuffre that I could not locate or where the statements have been removed.

- f. There are sites that hosted the articles containing the statements made against Ms. Giuffre where the visitor data is not accessible or where I could not confirm the number of visitors.
- g. I did not consider the dissemination via social media platforms of articles containing the statements made against Ms. Giuffre.
- h. Many sites published multiple articles on multiple days that contained or referenced the statements made against Ms. Giuffre; however, I did not include these multiple publication dates in calculating unique daily visitors.
- i. I did not include unique daily visitors to articles that link from that article to one or more of the articles containing the statements made against Ms. Giuffre.
- j. Finally, I did not include the counts of those who may have been searching and seen the statements made against Ms. Giuffre in the search results listing.

V. <u>BACKGROUND WEB ANALYTICS FOR TRAFFIC ANALYSIS</u>

- 15. In the course of forming this opinion, I implemented numerous web analytics and related techniques commonly used in the industry. In order to more clearly discuss these techniques, I define the following terms:
- <u>Direct Traffic</u>: visitors to a website that come from entering a website link into a browser location bar (e.g., not coming via a link on another website).
- <u>Dissemination</u>: the act of spreading or the circulation of information or articles.
- <u>Domain</u>: a specific Internet website that are administered as a unit and defined by an Internet Protocol (IP) address.

- Reach: the percentage or number of people who visit a website out of the total targeted population.
- Referral Traffic: visitors to a site that come from websites other than search engines.
- Repeat Visits: visitor traffic to a website in a given period that just includes multiple visits from the same set of IP addresses (i.e., IP addresses with more than one visit); provides a count of the people who have visited a site more than once in a given period. An individual is usually defined by a combination of IP address and browser within a given period but can also be defined by more sophisticated methods.
- <u>Search Engine</u>: a program and associated hardware and processes that allows people to find information on the Web, typically via the submission of queries consisting of terms.
- <u>Search Traffic:</u> visitors to a site that come from search engines rather than from other websites or via direct navigation.
- <u>Search</u>: a submission of a query to a search engine, usually in the form of terms forming a query.
- Share: sharing of an article or webpage typically via some social media platform.
 - <u>Social Media</u>: content that is shared via a social networking website.
- <u>Unique Visits</u>: visitor traffic to a website within a given period that includes only the first visit (i.e., subsequent visits are ignored), which excludes repeat visits; provides a count of the individuals who have visited a site in a given period.

- <u>Unique Daily Visitors</u>: visitor traffic to a website who visits a site at least once in a given 24-hour period. Each visitor, to the site, is counted once during the reporting period, which means it excludes repeat visits; provides a count of the individuals who have visited a site on a given day.
- <u>Visits</u>: a count of all the traffic to a website in a given period, including both unique and repeat visits.
- Web Analytics: the measurement, collection, analysis and reporting of web data.

VI. METHODOLOGY

- 16. I was asked to determine the dissemination of articles containing the statements made against Ms. Giuffre.
- 17. In forming my opinion, I utilized accepted web analytics and related methodologies in developing my assessment.
- 18. To that end, I employed various publicly available online analytic services, as well as some subscription-based services in conducting my research, including:
 - Alexa: an online service that provides web traffic data and analysis.
 - **Compete**: an online service that provides web traffic data and analysis.
- Google Keyword Tool: an online service that provides the number of searches for a given set of keywords in a given month on the Google search engine.
- Google Trends: an online service that shows how often a particular term is relatively searched on the Google search engine in a given period.
 - **SimiliarWeb**: an online service that provides web traffic data and analysis.
- **SpyFu**: an online service providing search data and analytics, including for both paid (i.e., advertisements) and organic (i.e., natural or algorithmic) channels.
 - **W3Snoop:** an online service that provides web traffic data and analysis.

- 19. These tools offer a variety of data and analysis services, and they are frequently utilized by industry professionals in the search engine optimization, web analytics, and search engine marketing fields for market, customer, and competitive analysis. Furthermore, where possible, I did my own assessments, as outlined below, in order to validate the data and analysis results.
- 20. I also utilized search engines, primarily Google and Bing, to assess the dissemination of articles containing the statements made against Ms. Giuffre.
- 21. Whenever possible, I used multiple data sources, which is a data verification technique known as triangulation², where one uses multiple and disparate sources for analysis and then compare the results from the separate analysis. If the results are similar, it reinforces the conclusion that the overall data analysis is valid.
- 22. In all of my assessments, I have used the most conservative numbers, meaning that I use the smallest value in arriving at the dissemination of articles containing the statements made against Ms. Giuffre. If I had not employed this conservative estimate, the number of potential dissemination of the articles containing the statements made against Ms. Giuffre would be 102,740,816 (i.e., more than 102 million) daily unique visitors.
- 23. In situations where I believed that I could not adequately verify the number of individuals or did not have confidence in the numbers in those situations, I did **not** include those numbers in the calculation of daily unique visitors.
- 24. My analysis is based on my experience, training, knowledge, and education and is formed through the application of that experience, training, knowledge, and education in the

² Triangulation (social science) http://en.wikipedia.org/wiki/Triangulation_%28social_science%29

principles of web data collection, web analytics, web search, search engines, web sites, and related areas.

VII. <u>DISSEMINATION OF THE STATEMENTS MADE AGAINST MS. GIUFFRE</u>

- 25. My opinion is that articles containing the statements made against Ms. Giuffre have been disseminated to at least 115 online media and others sites in 178 separate stories or articles with a combine 66,909,965 unique daily visitors.
- 26. This is a conservative estimate, and it is more likely than not, the statements have received wider dissemination due to factors such as:
- a. I used a set of online websites (115) to calculate the dissemination of articles, and it is reasonable that I have not located all references to the statements made against Ms. Giuffre by the time of the submission of this report. So, there may be more sites with articles containing the statements made against Ms. Giuffre that are **not** included in my calculations.
- b. My focus of analysis was the online dissemination of the statements made against Ms. Giuffre. Therefore, I examined only online sources and **not** dissemination of the statements made against Ms. Giuffre via print or broadcast media. It is reasonable to assume that the statements made against Ms. Giuffre were disseminated via these other channels.
- c. I have not attempted to measure face-to-face dissemination of the statements made against Ms. Giuffre. Therefore, these sources of dissemination are **not** included in the count of daily unique visitors.
- d. I did not have access to certain online sources where the statements against Ms. Giuffre may have been disseminated (e.g., email messages, social media messages,

articles behind firewalls, etc.). Therefore, these sources are **not** included in the count of daily unique visitors.

- e. There may be sites that have hosted articles containing the statements made against Ms. Giuffre where the articles have been removed. Therefore, I did **not** include these sites in my calculation of the unique daily visitors.
- f. There are sites where the visitor data is not accessible or where I could not reasonably check the number of visitors. In these cases, even though I had confirmed the site had posted one or more articles containing the statements made against Ms. Giuffre, I did **not** include these sites in my calculation of the unique daily visitors.
- g. I did **not** consider the dissemination via social media platforms of articles containing the statements made against Ms. Giuffre.
- h. Many sites published multiple articles on multiple days that contain or reference the statements made against Ms. Giuffre; however, I did **not** use these multiple articles from the same site with different publication dates in my calculations in determining the number of daily unique visitors who have been exposed to the articles containing the statements made against Ms. Giuffre.
- i. I did **not** include articles that link to one or more of the articles containing
 the statements made against Ms. Giuffre. Unless the article directly referenced the statements
 made against Ms. Giuffre, I did **not** include it in my analysis.
- j. Finally, I did **not** include people who may been searching and may have seen the statements made against Ms. Giuffre in the search results, without needing to visit the actual articles posted on the websites.

VIII. METHODOLOGY TO DETERMINE THE DISSEMINATION OF THE STATEMENTS MADE AGAINST MS. GIUFFRE

- 27. I have been informed that the statements made against Ms. Giuffre were originally contained in an email message from Mr. Ross Gow³, of Acuity Reputation, acting on behalf of Ms. Maxwell, that was sent on 2 January 2015 at 8:38 pm⁴ to, based on the email addresses⁵, people at The Mail Online⁶, The Independent⁷, The Mirror⁸, The Times⁹, and the BBC¹⁰. The email message from Mr. Gow contained the statements made against Ms. Giuffre. A screen shot of the email message is shown in Figure 1.
- 28. Figure 1: Email message from Mr. Ross Gow containing the statements made against Ms. Giuffre.

³ GM_00068 (Gow E-Mail)

⁴ I am assuming, based on the location of Mr. Gow's company, Acuity Reputation, that this is date-time stamp for the United Kingdom.

⁵ Note: For some reason, the contact at the Mail Online is on the cc: line, while the other recipients are in the to: line. Also, the email message is sent to two recipients at the BBC.

⁶ https://en.wikipedia.org/wiki/Mail Online

https://en.wikipedia.org/wiki/The_Independent

⁸ https://en.wikipedia.org/wiki/Daily_Mirror

⁹ https://en.wikipedia.org/wiki/The_Times

¹⁰ https://en.wikipedia.org/wiki/BBC_News

From: <ross@acuityreputation.com> Date: 2 January 2015 at 20:38

Subject: Ghislaine Maxwell

To: Rossacuity Gow < ross@acuityreputation.com >

bcc: martin.robinson@mailonline.co.uk,

P.Peachey@independent.co.uk, nick.sommerlad@mirror.co.uk, david.brown@thetimes.co.uk, nick.alway@bbc.co.uk,

jo-anne.pugh@bbc.co.uk

To Whom It May Concern,

Please find attached a quotable statement on behalf of Ms Maxwell.

No further communication will be provided by her on this matter.

Thanks for your understanding.

Best Ross

Ross Gow

ACUITY Reputation

Jane Doe 3 is Virginia Roberts - so not a new individual. The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue. The original allegations are not new and have been fully responded to and shown to be untrue.

Each time the story is re told it changes with new salacious details about public figures and world leaders and now it is alleged by Ms Roberts that Alan Derschowitz is involved in having sexual relations with her, which he denies.

Ms Roberts claims are obvious lies and should be treated as such and not publicised as news, as they are defamatory.

Ghislaine Maxwell's original response to the lies and defamatory claims remains the same. Maxwell strongly denies allegations of an unsavoury nature, which have appeared in the British press and elsewhere and reserves her right to seek redress at the repetition of such old defamatory claims.

Sent from my BlackBerry® wireless device

29. I have been informed that the statements made against Ms. Giuffre were confirmed by Ms. Maxwell in a news article and video¹¹ aired on 5 January 2015, which I have established by reviewing the video referenced in the news article¹².

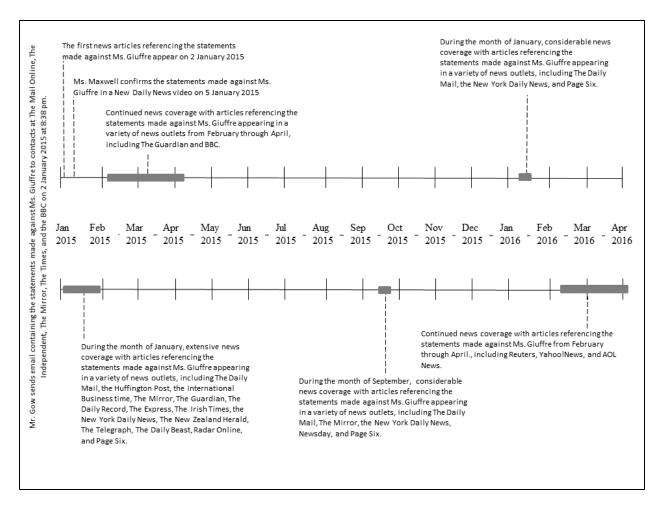
¹¹ GIUFFRE001120

¹² http://www.nydailynews.com/news/world/alleged-madame-accused-supplying-prince-andrew-article-1.2065505

- 30. Additionally, on 8 January 2015, agents reportedly acting on behalf of Ms. Maxwell made statements that the allegations against her were a "web of lies and deceit" which are similar to the statements made against Ms. Giuffre in the message from Mr. Gow.
- 31. Similarly, on 1 February 2015, like statements were quoted as "These allegations are untrue and defamatory"¹⁴, which are similar to the statements made against Ms. Giuffre in the message from Mr. Gow.
- 32. Based on my investigation and research, news stories, articles, and postings containing direct reference to or quotes from the statements made against Ms. Giuffre appeared the same day (i.e., 2 January 2015) as the email from Mr. Gow, with several news organizations and other sites publishing other articles containing direct reference to or quotes from the statements made against Ms. Giuffre in the immediately following days. News articles containing direct reference to or quotes of the statements made against Ms. Giuffre have continued to appear in news articles and other postings nearly up to the date that I submitted this report.
- 33. A timeline of events relating to the dissemination of the statements made against Ms. Giuffre is shown in Figure 2.
- 34. Figure 2: Timeline of events relating to the dissemination of the statements made against Ms. Giuffre from 2 January 2015 onwards.

¹³ https://www.thesun.co.uk/archives/news/6754/prince-andrews-pal-ghislaine-groped-teen-girls/

¹⁴ http://www.mirror.co.uk/news/uk-news/prince-andrews-pal-ghislaine-maxwell-5081971



- 35. Concerning the procedure employed in determining the dissemination of the statements made against Ms. Giuffre, nearly every major news site¹⁵ that I investigated, along with other specific news sites in the United States, the United Kingdom, Canada, and Australia, as well as other countries, have carried some aspects of the overall story related to Ms. Giuffre and/or Ms. Maxwell, or other parties involved.
- 36. In fact, there are tens of thousands of news articles and postings concerning the general story from news outlets worldwide, with combined potential viewership in the multimillions, as searches on the major search engines, such as Google and Bing, show.

¹⁵ Including the largest online news sites, such as Yahoo! News, Google News, Huffington Post, CNN, NY Times, Fox News, NBC News, Daily Mail, Washington Post, The Guardian, Wall Street Journal, ABC News, BBC News, USA Today, LA Times (see http://www.ebizmba.com/articles/news-websites)

- 37. However, I was not interested in news articles that **just** discussed the story in general or other aspects of the story. Also, I was **not** interested in those articles where Ms. Maxwell or those acting on her behalf, such as Mr. Gow, would just generally deny the allegations in the complaint ¹⁶. I was specifically interested in only those articles that referenced directly or quoted the statements made against Ms. Giuffre in the 2 January 2015 email message from Mr. Gow, Ms. Maxwell's subsequent confirmation of the statements, or similar statements as those in the message from Mr. Gow. Naturally, this narrow focus is a smaller subset of news articles than are the articles addressing the overall story.
- 38. To isolate these articles of interest, I generated a series of 10 queries¹⁷ that specifically targeted news articles from the case that addressed the statements made against Ms. Maxwell (e.g., *Ghislaine Maxwell obvious lies*) to retrieve a set of articles that directly related to the statements made against Ms. Giuffre¹⁸. I employed a modified snowball technique¹⁹, starting with one seed query, adding and modifying terms, until I was not retrieving new results. I also located some articles via navigating from the set of retrieved articles.
- 39. I set the search range date from 2 January 2015 onward, so articles prior to that date were not included in the search results. For each article used in my analysis, I also verified the date that the article was published to ensure it was published on or after 2 January 2015 and that the articles directly referenced in some way the statements made against Ms. Giuffre.
- 40. An example of a search engine results page in response to one of these queries is shown in Figure 3.

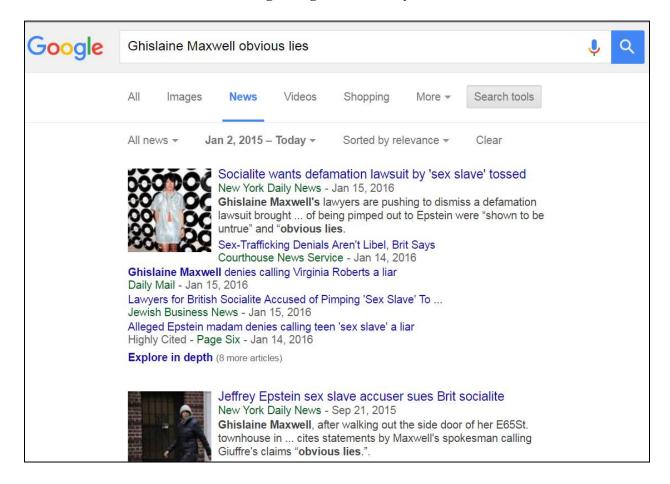
¹⁶ Complaint, VIRGINIA L. GIUFFRE, Plaintiff, v. GHISLAINE MAXWELL, Defendant. CASE NO. 1:15-cv-07433.

¹⁷ Ghislaine Maxwell obvious lies, Ghislaine Maxwell Roberts obvious lies cnn, Ghislaine Maxwell Virginia Roberts, Giuffre Maxwell obvious lies, new york daily news alleged madam andrews, Prince Andrew Maxwell Roberts, Prince Andrew obvious lies, prince andrew's sex slave scandal who is maxwell, Ross Gow obvious lies, sex slave obvious lies.

¹⁸ In addition to the queries, I located some articles via direction navigation.

¹⁹ https://en.wikipedia.org/wiki/Snowball_sampling

41. Figure 3: Google News search results for the search *Ghislaine Maxwell obvious lies* with a date delimiter beginning on 2 January 2015.



- 42. I then personally verified that each article, by reviewing each article, used in my analysis directly referenced in some way the statements made against Ms. Giuffre.
- 43. So, articles relating to the overall story that did **not** mention Ms. Maxwell's statements made against Ms. Giuffre were **not** included in the analysis. Articles relating to the overall story that referred to Ms. Maxwell simply denying the charges were **not** included.
- 44. I also personally performed a site search²⁰ of the top 15 online media sites worldwide²¹ of articles related to the case, and I reviewed the results to identify if any of these

²⁰ https://www.google.com/advanced_search

²¹ Yahoo! News, Google News, Huffington Post, CNN, NY Times, Fox News, NBC News, Daily Mail, Washington Post, The Guardian, Wall Street Journal, ABC News, BBC News, USA Today, LA Times (see http://www.ebizmba.com/articles/news-websites)

articles referred to the statements against Ms. Giuffre. I also did the same for many country-specific news sites in the United States, the United Kingdom, Canada, and Australia.

- 45. In the end, I had a set of 178 online news and other articles from 2 January 2105 to the date that I filed this report that specifically referenced the statements made against Ms. Giuffre to conduct my analysis, as outlined below.
- 46. Each of these 178 online articles was posted online. The 178 online articles were distributed among 115 unique domain websites (i.e., some websites posted multiple articles that contain the statements made against Ms. Giuffre). These 115 domains are:
 - http://beforeitsnews.com
 - http://boltonbnp.blogspot.com
 - http://businessnewsusa.org
 - http://dukefmduluth.com
 - http://dukefmfargo.com
 - http://home.bt.com
 - http://jewishbusinessnews.com
 - http://jewishnews.timesofisrael.com
 - http://kdal610.com
 - http://kfgo.com
 - http://motivatornews.com
 - http://mrharrywales.tumblr.com
 - http://muhammad-ali-ben-marcus.blogspot.com
 - http://news.sky.com
 - http://news.trust.org
 - http://newsbite.it
 - http://newstoday.club
 - http://normanfinkelstein.com
 - http://onewayempire.com
 - http://pagesix.com
 - http://planetinvestigations.com
 - http://softwaresuites.ne
 - http://thisviral.com
 - http://townhall.com
 - http://ugandansatheart.blogspot.com
 - http://uk.reuters.com
 - http://whatiswrongwiththispicture2012.blogspot.com
 - http://whbl.com
 - http://whtc.com

- http://wibqam.com
- http://wifc.com
- http://wincountry.com
- http://wkzo.com
- http://worlddailynews.info
- http://wsau.com
- http://wtaq.com
- http://wtvbam.com
- http://www.anorak.co.uk
- http://www.aol.co.uk
- http://www.asianimage.co.uk
- http://www.bailiwickexpress.com
- http://www.bannednews.net
- http://www.bbc.com
- http://www.belfasttelegraph.co.uk
- http://www.bournemouthecho.co.uk
- http://www.businessinsider.com
- http://www.business-standard.com
- http://www.capitalbay.news
- http://www.clactonandfrintongazette.co.uk
- http://www.courthousenews.com
- http://www.dailylife.com.au
- http://www.dailymail.co.uk
- http://www.dailyrecord.co.uk
- http://www.darkpolitricks.com
- http://www.dudleynews.co.uk
- http://www.eveningtimes.co.uk
- http://www.express.co.uk
- http://www.faceiraq.com
- http://www.ghanagrio.com
- http://www.ghanareview.com
- http://www.govtslaves.info
- http://www.headlines-news.com
- http://www.huffingtonpost.co.uk
- http://www.ibtimes.co.uk
- http://www.independent.ie
- http://www.infiniteunknown.net
- http://www.iol.co.za
- http://www.irishexaminer.com
- http://www.irishmirror.ie
- http://www.irishtimes.com
- http://www.itv.com
- http://www.lancashiretelegraph.co.uk
- http://www.lse.co.uk

- http://www.mgtowhq.com
- http://www.mirror.co.uk
- http://www.msn.com
- http://www.nationalenquirer.com
- http://www.newindianexpress.com
- http://www.newscopia.com
- http://www.newsday.com
- http://www.newsgrio.com
- http://www.nigeriadailynews.news
- http://www.nydailynews.com
- http://www.nzherald.co.nz
- http://www.oneworldofnations.com
- http://www.oxfordmail.co.uk
- http://www.pressreader.com
- http://www.reuters.com
- http://www.scmp.com
- http://www.scotsman.com
- http://www.somersetlive.co.uk
- http://www.srnnews.com
- http://www.swindonadvertiser.co.uk
- http://www.telegraph.co.uk
- http://www.theargus.co.uk
- http://www.theboltonnews.co.uk
- http://www.thedailybeast.com
- http://www.thetelegraphandargus.co.uk
- http://www.thetruthseeker.co.uk
- http://www.twimovies.news
- http://www.westernmorningnews.co.uk
- http://www.wirralglobe.co.uk
- http://www.yorkpress.co.uk
- http://www.yorkshirepost.co.uk
- https://blairzhit.wordpress.com
- https://bol.bna.com
- https://ca.news.yahoo.com
- https://circusbuoy.wordpress.com
- https://quartetbooks.wordpress.com
- https://thetruth24.info
- https://www.eveningtelegraph.co.uk
- https://www.theguardian.com
- https://www.thesun.co.uk
- https://www.yahoo.com
- http://ferddyjay.blogspot.com

- 47. As seen from the list of domains that have published articles or stories containing references to the statement made against Ms. Giuffre, many of these domains are those of major news organizations or sources, including AOL News, BBC, Huffington Post, International Business Times, Irish Times, MSN News, National Enquirer, New York Daily News, New Zealand Herald, Page Six, Radar Online, Reuters, The Daily Beast, The Daily Mail, The Express, The Guardian, The Mirror, The Sun, The Telegraph, Yahoo! News, etc.
- 48. I then used a variety of web analytics traffic services and other sources to get the unique daily visitor traffic for each of these domains. I used multiple services when available to verify the unique daily visitor traffic for each of these domains, as these traffic services may use different techniques to arrive at their traffic numbers.
- 49. In cases of conflicting unique daily visitor traffic numbers, I utilized the most conservative (i.e., smallest) number.
- 50. In cases where I determined I could not get unique daily visitor traffic numbers or the unique daily visitor traffic were not reliable, in my opinion, I did not include the unique daily visitor traffic numbers for that domain in the numbers. This usually occurred for the sites with a smaller number of daily visitors or sites with an extremely large number of daily visitors.
- 51. Unique daily visitors measure is an industry standard web analytics metric for measuring people that visit a website in a given day, also known as unique audience²². It is generally averaged out over multiple days with a given period, such as week or month, as there are normal daily fluctuations.
- 52. Table 1 shows the unique daily visitor traffic for the listed domains that posted articles or stories referencing the statements made against Ms. Giuffre and the associated unique

²² http://digitalmeasurement.nielsen.com/files/metrics-guidelines.pdf

daily visitor traffic for each of those domains, along with number of articles containing the statements made against Ms. Giuffre posted on that site.

53. Table 1: Domains that published articles or stories containing the statements made against Ms. Giuffre with the domain's number of unique daily visitors and the number of articles containing the statements made against Ms. Giuffre published on that domain from 2 January 2015 to the date that I filed this report²³.

| No. | Domain | Domain Unique
Visitor Traffic
(Daily) | Number of
Articles
Published |
|-----|---|---|------------------------------------|
| 1 | http://beforeitsnews.com | 193,333 | 1 |
| 2 | http://boltonbnp.blogspot.coma | - | 1 |
| 3 | http://businessnewsusa.orga | - | 1 |
| 4 | http://dukefmduluth.coma | - | 1 |
| 5 | http://dukefmfargo.coma | - | 1 |
| 6 | http://home.bt.com | 800,000 | 1 |
| 7 | http://jewishbusinessnews.com | 5,000 | 2 |
| 8 | http://jewishnews.timesofisrael.coma | - | 1 |
| 9 | http://kdal610.com | 257 | 1 |
| 10 | http://kfgo.com | 1,600 | 1 |
| 11 | http://motivatornews.com ^a | - | 1 |
| 12 | http://mrharrywales.tumblr.coma | - | 1 |
| 13 | http://muhammad-ali-ben-marcus.blogspot.coma | - | 1 |
| 14 | http://news.sky.com | 523,333 | 2 |
| 15 | http://news.trust.orga | - | 1 |
| 16 | http://newsbite.ita | - | 1 |
| 17 | http://newstoday.club ^a | - | 1 |
| 18 | http://normanfinkelstein.com | 1,987 | 1 |
| 19 | http://onewayempire.coma | - | 1 |
| 20 | http://pagesix.com | 320,000 | 5 |
| 21 | http://planetinvestigations.coma | - | 1 |
| 22 | http://softwaresuites.nea | - | 1 |
| 23 | http://thisviral.coma | - | 1 |
| 24 | http://townhall.com | 236,667 | 1 |
| 25 | http://ugandansatheart.blogspot.coma | - | 1 |
| 26 | http://uk.reuters.com | 153,333 | 1 |
| 27 | http://whatiswrongwiththispicture2012.blogspot.coma | - | 1 |

²³ Note: Some outlets, I was able to get self-reported visitor numbers, such as the https://www.theguardian.com.

| No. | Domain | Domain Unique
Visitor Traffic
(Daily) | Number of
Articles
Published |
|-----|---|---|------------------------------------|
| 28 | http://whbl.com | 12,252 | 1 |
| 29 | http://whtc.com | 1,207 | 1 |
| 30 | http://wibqam.coma | - | 1 |
| 31 | http://wifc.com | 990 | 1 |
| 32 | http://wincountry.com | 503 | 1 |
| 33 | http://wkzo.com | 573 | 1 |
| 34 | http://worlddailynews.info ^a | - | 1 |
| 35 | http://wsau.com | 2,653 | 1 |
| 36 | http://wtaq.coma | - | 1 |
| 37 | http://wtvbam.coma | - | 1 |
| 38 | http://www.anorak.co.uk | 7,150 | 1 |
| 39 | http://www.aol.co.uk | 423,333 | 2 |
| 40 | http://www.asianimage.co.uk | 1,293 | 1 |
| 41 | http://www.bailiwickexpress.com | 29,633 | 1 |
| 42 | http://www.bannednews.net ^a | - | 1 |
| 43 | http://www.bbc.com | 12,950,000 | 1 |
| 44 | http://www.belfasttelegraph.co.uka | - | 1 |
| 45 | http://www.bournemouthecho.co.uka | - | 1 |
| 46 | http://www.businessinsider.com | 3,866,667 | 1 |
| 47 | http://www.business-standard.coma | - | 1 |
| 48 | http://www.capitalbay.newsa | - | 1 |
| 49 | http://www.clactonandfrintongazette.co.uk | - | 1 |
| 50 | http://www.courthousenews.com | 11,333 | 3 |
| 51 | http://www.dailylife.com.au | 80,000 | 1 |
| 52 | http://www.dailymail.co.uk | 14,276,667 | 6 |
| 53 | http://www.dailyrecord.co.uk | 145,048 | 3 |
| 54 | http://www.darkpolitricks.coma | - | 1 |
| 55 | http://www.dudleynews.co.uka | - | 1 |
| 56 | http://www.eveningtimes.co.uk | 3,667 | 1 |
| 57 | http://www.express.co.uk | 1,686,667 | 1 |
| 58 | http://www.faceiraq.coma | - | 1 |
| 59 | http://www.ghanagrio.coma | - | 4 |
| 60 | http://www.ghanareview.coma | _ | 1 |
| 61 | http://www.govtslaves.infoa | - | 1 |
| 62 | http://www.headlines-news.coma | - | 1 |
| 63 | http://www.huffingtonpost.co.uk | 750,000 | 3 |
| 64 | http://www.ibtimes.co.uk | 1,380,000 | 3 |
| 65 | http://www.independent.iea | - | 1 |
| 66 | http://www.infiniteunknown.net | 3,183 | 1 |
| 67 | http://www.iol.co.za | 233,333 | 1 |

| No. | Domain | Domain Unique
Visitor Traffic
(Daily) | Number of
Articles
Published |
|-----|--|---|------------------------------------|
| 68 | http://www.irishexaminer.coma | - | 1 |
| 69 | http://www.irishmirror.ie | 100,000 | 3 |
| 70 | http://www.irishtimes.com | 323,333 | 1 |
| 71 | http://www.itv.com | 1,026,667 | 2 |
| 72 | http://www.lancashiretelegraph.co.uka | - | 1 |
| 73 | http://www.lse.co.uk | 70,000 | 1 |
| 74 | http://www.mgtowhq.coma | - | 1 |
| 75 | http://www.mirror.co.uk | 3,860,000 | 10 |
| 76 | http://www.msn.comb | - | 2 |
| 77 | http://www.nationalenquirer.com | 60,000 | 1 |
| 78 | http://www.newindianexpress.coma | - | 1 |
| 79 | http://www.newscopia.coma | - | 1 |
| 80 | http://www.newsday.com | 132,250 | 1 |
| 81 | http://www.newsgrio.com | 132,250 | 2 |
| 82 | http://www.nigeriadailynews.news | 16,236 | 4 |
| 83 | http://www.nydailynews.com | 2,100,000 | 6 |
| 84 | http://www.nzherald.co.nz | 686,667 | 1 |
| 85 | http://www.oneworldofnations.coma | - | 1 |
| 86 | http://www.oxfordmail.co.uka | - | 1 |
| 87 | http://www.pressreader.com | 110,000 | 4 |
| 88 | http://www.reuters.com | 2,363,333 | 1 |
| 89 | http://www.scmp.coma | - | 1 |
| 90 | http://www.scotsman.com | 125,393 | 1 |
| 91 | http://www.somersetlive.co.uka | - | 1 |
| 92 | http://www.srnnews.coma | - | 1 |
| 93 | http://www.swindonadvertiser.co.uk | 22,077 | 2 |
| 94 | http://www.telegraph.co.uk | 5,506,667 | 1 |
| | http://www.theargus.co.uk | 59,281 | 3 |
| 96 | http://www.theboltonnews.co.uk | 40,000 | 2 |
| 97 | http://www.thedailybeast.com | 1,636,667 | 3 |
| 98 | http://www.thetelegraphandargus.co.uk | 46,667 | 1 |
| 99 | http://www.thetruthseeker.co.uk | 21,757 | 1 |
| 100 | http://www.twimovies.newsa | - | 1 |
| 101 | http://www.westernmorningnews.co.uka | - | 1 |
| 102 | http://www.wirralglobe.co.uka | - | 3 |
| 103 | http://www.yorkpress.co.uka | - | 1 |
| 104 | http://www.yorkshirepost.co.uka | - | 1 |
| 105 | https://blairzhit.wordpress.coma | - | 1 |
| 106 | | | |
| 107 | https://ca.news.yahoo.com ^b | - | 1 |

| No. | Domain | Domain Unique
Visitor Traffic
(Daily) | Number of
Articles
Published |
|-----|---|---|------------------------------------|
| 108 | https://circusbuoy.wordpress.coma | - | 1 |
| 109 | https://quartetbooks.wordpress.com ^a | - | 1 |
| 110 | https://thetruth24.infoa | - | 1 |
| 111 | https://www.eveningtelegraph.co.uka | - | 2 |
| 112 | https://www.theguardian.com | 8,872,392 | 6 |
| 113 | https://www.thesun.co.uk | 1,496,667 | 1 |
| 114 | https://www.yahoo.com ^b | - | 1 |
| 115 | http://ferddyjay.blogspot.coma | - | 1 |
| | | 66,909,965 | 178 |

a - Unique daily visitor traffic not available

54. I used each domain's unique daily visitor count to calculate the dissemination of the articles containing the statements against Ms. Giuffre to various websites and potentially to visitors to that site (i.e., as visitors to the news sites, these individuals could have been exposed to the articles containing the statements made against Ms. Giuffre), using the unique daily visitor number only once for each domain, regardless whether that domain published more than one article referring to the statements made against Ms. Giuffre.

IX. RESULTS FOR ANALYSIS OF THE DISSEMINATION OF THE STATEMENTS MADE AGAINST MS. GIUFFRE

- 55. Based on my analysis as outlined above, my opinion is that the statements against Ms. Giuffre have been disseminated to at least 115 online media and other sites with 178 stories or articles with a combined 66,909,965 (more than 66 million) unique daily visitors traffic.
- 56. I note that for many of the 178 articles containing the statements made against Ms. Giuffre, one could get gist of the story of the article directly from the article headline. I point this out as it is well known that people skim online news sites²⁴, so titles such as these

^b - Unique daily visitor traffic not verifiable

²⁴ See for example: Aikat, D. News on the web: usage trends of an on-line newspaper. Convergence: The International Journal of Research into New Media Technologies 4, 4 (Dec. 1998), 94-110.

would have substantial impact on visitors to that site. Examples of such articles headlines (examples of actual headlines from the 178 articles) are:

- British socialite to face Epstein accuser's defamation lawsuit
- Alleged Epstein madam denies calling teen 'sex slave' a liar
- Sex-Trafficking Denials Aren't Libel, Brit Says
- U.S. woman who claimed she was forced to have sex with Prince Andrew sues British socialite for denying that she recruited her to be a sex slave
- British 'madam' accused of recruiting teenage 'sex slave' Virginia Roberts

 for Prince Andrew's friend Jeffrey Epstein denies calling her a liar
 - Ghislaine Maxwell denies calling Virginia Roberts a liar
- Bill Clinton Pedophile Sex Scandal: Socialite Denies Calling ENQUIRER

 Source A Liar, Woman files defamation suit against British publishing magnate
 - Jeffrey Epstein sex slave accuser sues Brit socialite for defamation
- Lawyers for British socialite accused of pimping 'sex slave' to Jeffrey Epstein push to dismiss defamation lawsuit.
- 57. This is a conservative estimate, and more likely than not, articles containing the statements made against Ms. Giuffre have been disseminated to more individuals.

X. WHY THE ESTIMATE IS LOW

- 58. This (66,909,965 individual unique daily traffic) is a conservative estimate, and it is more likely than not, the statements have received wider dissemination due to factors such as:
- a. Although I spend considerable effort to locate published articles that contained the statements made against Ms. Giuffre, it is reasonable to assume that I have not located all such articles by the time of the submission of this report. So, there are possibly more

sites with articles containing the statements made against Ms. Giuffre that are not included in my calculations, which would increase the dissemination of the articles.

- b. The focus of my analysis was the dissemination of online articles containing the statements made against Ms. Giuffre, and I examined only online sources and not print or broadcast media. Many of the media outlets that I did identify have consider print distribution²⁵, which are not included in my calculations, for example, such as:
 - The Sun (print circulation) 1,741,838
 - Daily Mail (print circulation) 1,562,361
 - The Daily Telegraph (print circulation) 472,936
 - The Times (print circulation) 402,752
 - The Guardian (print circulation) 161,152
- c. In my analysis, I did not attempt to measure face-to-face dissemination that may have occurred after individuals may have read articles containing the statements made against Ms. Giuffre, which would increase the count.
- d. Naturally, I could not access certain online sources where the statements made against Ms. Giuffre may have been disseminated (e.g., email messages, social media messages, articles behind firewalls, etc.). Therefore, these numbers are not included in my calculations.
- e. Also, there are possibly sites that have hosted articles containing the statements made against Ms. Giuffre where the articles have been removed. Therefore, they are not included in my calculations.

 $^{^{25}\} www.theguardian.com/media/2016/mar/17/independent-mirror-express-and-star-suffer-sharp-fall-in-traffic$

- f. For sites where one or more of the articles containing the statements made against Ms. Giuffre are posted but where I could not locate or not determine reliable daily unique visitor traffic, I have not included these sites in my calculations. There are 59 (of the 115 sites, 51.3%) where I could not get or not get verifiable traffic data. For example, the traffic numbers for the MSN News (Microsoft) and Yahoo! News are not separated by news and other services, such as search, so I did not include these in the number of people to which the articles containing the statements made against were disseminated.
- g. I did not include the dissemination of the articles containing the statements made against Ms. Giuffre directly to social media platforms. However, many of the articles containing the statements made against Ms. Giuffre do include counts of the number of times that individuals shared the article to a social media networks, as shown in Table 2.

i. Table 2: Number of social media shares by published article containing the statements made against Ms. Giuffre.

| Shares | Date | Domain |
|--------|----------|--|
| 12576 | 2-Jan-15 | https://www.theguardian.com |
| 201 | 3-Jan-15 | http://muhammad-ali-ben-marcus.blogspot.qa |
| 1600 | 3-Jan-15 | http://www.dailymail.co.uk |
| 4000 | 3-Jan-15 | http://www.dailymail.co.uk |
| 130 | 3-Jan-15 | http://www.huffingtonpost.co.uk |
| 45 | 3-Jan-15 | http://www.ibtimes.co.uk |
| 6436 | 3-Jan-15 | http://www.mirror.co.uk |
| 55 | 4-Jan-15 | http://newsbite.it |
| 56 | 4-Jan-15 | http://ugandansatheart.blogspot.com |
| 1813 | 4-Jan-15 | http://www.dailyrecord.co.uk |
| 9 | 4-Jan-15 | http://www.express.co.uk |
| 560 | 4-Jan-15 | http://www.huffingtonpost.co.uk |
| 24 | 4-Jan-15 | http://www.ibtimes.co.uk |
| 54 | 4-Jan-15 | http://www.ibtimes.co.uk |
| 198 | 4-Jan-15 | http://www.irishmirror.ie |
| 198 | 4-Jan-15 | http://www.mirror.co.uk |
| 174 | 4-Jan-15 | http://www.nigeriadailynews.news |
| 51 | 4-Jan-15 | http://www.nzherald.co.nz |

| Shares | Date | Domain |
|--------|-----------|---|
| 216 | 4-Jan-15 | http://www.telegraph.co.uk |
| 177 | 4-Jan-15 | https://www.theguardian.com |
| 193 | 4-Jan-15 | https://www.theguardian.com |
| 105 | 5-Jan-15 | http://www.dailylife.com.au |
| 192 | 5-Jan-15 | http://www.dailyrecord.co.uk |
| 7 | 5-Jan-15 | http://www.mirror.co.uk |
| 1052 | 5-Jan-15 | http://www.mirror.co.uk |
| 96 | 5-Jan-15 | http://www.nydailynews.com |
| 115 | 5-Jan-15 | https://www.theguardian.com |
| 45 | 6-Jan-15 | http://www.dailymail.co.uk |
| 17 | 8-Jan-15 | http://www.nydailynews.com |
| 114 | 10-Jan-15 | http://www.dailymail.co.uk |
| 1 | 10-Jan-15 | http://www.infiniteunknown.net |
| 1466 | 10-Jan-15 | https://www.theguardian.com |
| 1 | 13-Jan-15 | http://whatiswrongwiththispicture2012.blogspot.qa |
| 256 | 22-Jan-15 | http://www.dailyrecord.co.uk |
| 120 | 22-Jan-15 | http://www.huffingtonpost.co.uk |
| 319 | 22-Jan-15 | http://www.irishmirror.ie |
| 338 | 22-Jan-15 | http://www.mirror.co.uk |
| 21 | 1-Feb-15 | http://www.mirror.co.uk |
| 342 | 7-Feb-15 | https://www.theguardian.com |
| 107 | 21-Sep-15 | http://www.nydailynews.com |
| 33 | 22-Sep-15 | http://www.dailymail.co.uk |
| 205 | 22-Sep-15 | http://www.mirror.co.uk |
| 1 | 15-Jan-16 | http://jewishbusinessnews.com |
| 13 | 15-Jan-16 | http://www.dailymail.co.uk |
| 17 | 15-Jan-16 | http://www.nationalenquirer.com |
| 2 | 15-Jan-16 | http://www.nydailynews.com |
| 7 | n.d. | http://www.govtslaves.info |
| 33,758 | | |

- ii. As shown in Table 2, the articles containing the statements made againstMs. Giuffre have been shared 33,758 times, mostly on Facebook.
- iii. Given that the median number of Facebook 'friends' is 200²⁶, this equates to a possible 6,751,600 individuals, in addition to the 33,758 individuals who originally shared

 $^{^{26}\} http://www.pewresearch.org/fact-tank/2014/02/03/6-new-facts-about-facebook/$

the articles, to which the articles containing the statements made against Ms. Giuffre could have been disseminated, assuming these individuals are all unique and have not already read one of the articles.

- iv. However, I did not include these social media shares in my calculations.
- v. Since news article viewing follows a power law²⁷ distribution²⁸, there is no direct linear ratio of number of social media shares to readership. There is published research that does report average of views of an article on a news website and also average social media shares²⁹. In a direct calculation with numbers from this article³⁰, 23 articles views per social media share, using 33,758 social media shares, this would be 776,434 article views. However, this ratio would vary by website, number of daily unique visitors, type of news article, time for accumulating shares, and possibly other factors. Plus, this number would not account for the people receiving the social media share that viewed the title, post, and snippet but did not click on the share to view the article on the website, thereby undercounting views of the articles.
- vi. Also, given the topical nature of the underlying news story, one could expect **lower** social media sharing but **higher** article viewing, as people will tend to read articles on such topics privately but not share on social media³¹. So, I would expect the social media number itself to be an undercount.
- h. I did not include articles that link to one of the articles containing the statements made against Ms. Giuffre in my calculations of dissemination. Unless the article

²⁷ https://en.wikipedia.org/wiki/Power_law

²⁸ See for example, Tatar, A., de Amorim, M. D., Fdida, S., & Antoniadis, P. (2014). A survey on predicting the popularity of web content. Journal of Internet Services and Applications, 5(1), 1.

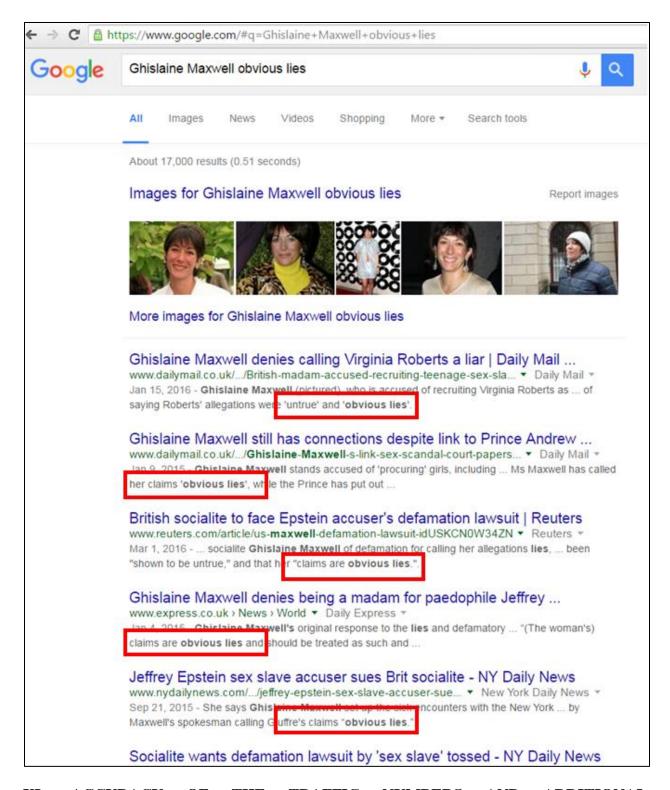
²⁹ See for example, Castillo, C., El-Haddad, M., Pfeffer, J., & Stempeck, M. (2014, February). Characterizing the life cycle of online news stories using social media reactions. In Proceedings of the 17th ACM conference on Computer supported cooperative work & social computing (pp. 211-223). ACM.

³⁰ Castillo, C., El-Haddad, M., Pfeffer, J., & Stempeck, M. (2014, February). Characterizing the life cycle of online news stories using social media reactions. In Proceedings of the 17th ACM conference on Computer supported cooperative work & social computing (pp. 211-223). ACM. ³¹ See for example, Agarwal, D., Chen, B. C., and Wang, X. Multi-faceted ranking of news articles using post-read actions. In Proc. of CIKM, ACM (2012), 694-703.

directly mentioned the statements made against Ms. Giuffre, I did not include that article in my calculations. So, unless the linking article actually mentioned, referenced, or quoted the statements made against Ms. Giuffre, I did not include it in the calculations.

- i. Many sites published multiple articles on multiple days that quoted or referenced the statements made against Ms. Giuffre; however, I did not use these multiple publication dates from the same site in my calculations of unique visitor traffic. If a domain published only one article containing the statements against Ms. Giuffre, then I directly used the unique daily visitors number. If a domain published multiple articles concerning the statements against Ms. Giuffre, I did not count the traffic for the subsequent articles containing the statements made against Ms. Giuffre, even though research shows that repeat traffic to websites is generally only about 30% 32, meaning that 70% of the traffic would be unique. However, I was not comfortable using this figure given the natural of these sites, which might have higher repeat visitors day-to-day. Therefore, I did not include the unique visitors to multiple articles in my calculations.
- j. Finally, I did not include the count of people who may been searching and may have seen the statements made against Ms. Giuffre in the search results, without needing to visit the actual articles, as shown in Figure 4.
- k. Figure 4: Example of search results with the statements made against Ms. Giuffre appearing in the result snippets, requiring no need to visit the articles themselves.

³² Teevan, J., Adar, E., Jones, R. and Potts, M. (2006). History repeats itself: repeat queries in Yahoo's logs. In *Proceedings of the 29th annual international ACM SIGIR conference on Research and development in information retrieval* (SIGIR '06). ACM, New York, NY, USA, 703-704.

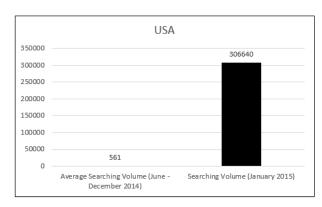


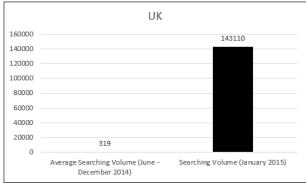
XI. <u>ACCURACY OF THE TRAFFIC NUMBERS AND ADDITIONAL</u> <u>VERIFICATION</u>

- 59. Concerning the accuracy of the analysis, the number of domains where the statements made against Ms. Giuffre have been disseminated is reliable, as this is straightforward to verify (i.e., the article is either posted on a site or it is not). If anything, this is an undercount, as some domains, for example, may have removed such articles, making them no longer available. There are possibly articles containing the statements that I have not been able to locate by the time that I submitted this report.
- 60. Concerning traffic numbers for domains, a unique visitor is typically identified by an identifier stored in a text file, which is based on an individual computer's browser, although more sophisticated methods are also being used. In locating traffic numbers for the domains, I used multiple services when available and attempted to verify via other sources. In case with varying traffic data, I utilized the most conservative (i.e., smallest) number available.
- 61. I also verified findings from my analysis via other methods and my own experience and training. For example, there are periods of increased publishing of articles containing the statements made against Ms. Giuffre and related stories. One would expect, increases in associated searching during these periods. Using the Google Keyword Tool, which provides search volume for search queries by month, I examined search volume from January 2015 to the date that I filed this report. There was an 54,518% increase in search volume for the keywords *Virginia Giuffre Virginia Roberts Ghislaine Maxwell* in January 2015, relative to the prior 7 months, in the US, and a 44,822% increase for the United Kingdom (UK) in January 2015, relative to the prior 7 months. This is in line with the increase in posting of articles during the same month³³. So, one sees the expected increase in searching for key terms based on the increase posting of articles.

³³ Note: I use the US and the UK as sample countries since there are aspect of the story that relate to each country.

- 62. Figure 5 shows increase in searching volume in January 2015 for the US and UK relative to the previous 7 months.
- 63. Figure 5: Increase in search volume in January 2015 for the US and UK relative to the previous 7 months for the keyphrase *Virginia Giuffre Virginia Roberts*Ghislaine Maxwell.





XII <u>SUMMARY</u>

- 64. The statements made against Ms. Giuffre have been disseminated to at least 115 online media or other sites in 178 separate stories or articles with a combined 66,909,965 individual unique visitors from 2 January 2015 to the date that I filed this report, inclusive. More likely than not, this is a conservative estimate.
- 65. Right to Amend: Although I have had access to materials publicly available pertaining to claims in this dispute, I have not been able to review all the material by the deadline for completion of this report. I reserve the right to review and rely on any such material, including at the time of trial. I also reserve the right to issue a supplemental or an amended report if my review of such material results in any significant change or addition to my opinion.

DATED: 09 September 2016

By____

Dr. Bernard J. Jansen Professor College of Information Sciences and Technology The Pennsylvania State University University Park, PA, 16802

Phone: 434-249-8687 Email: jjansen@acm.orq

URL: http://ist.psu.edu/faculty pages/jjansen/

Appendix A Curriculum Vitae



Full Professor

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University Park, Pennsylvania 16802, USA Voice: +1-434-249-8687

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Principal Scientist, Social Computing Group, Qatar Computing Research Institute (QCRI), Hamad Bin Khalifa University, Doha, Qatar

Affiliate Appointment, Department of Computer Science and Engineering, The Pennsylvania State University

Affiliate Appointment, Department of Industrial and Manufacturing Engineering, The Pennsylvania State University

Director, Information Searching and Learning Laboratory, College of Information Sciences and Technology (ISL²), The Pennsylvania State University

Current Advisory Boards

- The Pennsylvania Technical Assistance Program (PennTAP) (http://penntap.psu.edu/)
- CLAK Impressions (http://www.linkedin.com/company/clak-impressions)
- Innoblue (http://www.linkedin.com/company/innoblue)

Research

<u>Research Goal</u>: Increase the effectiveness and efficiency for accomplishing information tasks by improving the interaction among people, information, and technology

Research Interests:

I study the uses and affordances of the Web for information searching and ecommerce, with a focus on interactions among the person, information, and technology. Current active research areas are **Web searching**, **information retrieval**, **keyword advertising**, **online marketing**, and **online social networking** within the ecommerce domain.

- Sponsored search and keyword advertising
- Social media as an information source
- Information searching and Web information retrieval

Short Bio:

Jim has authored or co-authored **250 or so research publications**, with articles appearing in a multi-disciplinary and extremely wide range of journals and conferences. He is author of the book, <u>Understanding Sponsored Search: A Coverage of the Core Elements of Keyword</u>

Research

Advertising (Cambridge University Press), author of the book <u>Understanding User - Web Interactions Via Web Analytics</u>, co-author of the book, <u>Web Search: Public Searching of the Web</u>, and co-editor of the book <u>Handbook of Research on Weblog Analysis</u>.

Jim is a full professor with the College of Information Sciences and Technology at The Pennsylvania State University and a Principal Scientist in the social computing group of the Qatar Computing Research Institute, Hamad bin Khalifa University. He is a graduate of West Point and has a PhD in computer science from Texas A&M University, along with master degrees from Texas A&M (computer science) and Troy State (international relations).

Jim is editor-in-chief of the journal, <u>Information Processing & Management</u> (Elsevier), a member of the editorial boards of seven international journals, former editor-in-chief of the journal, <u>Internet Research</u> (Emerald), and he has served on the research committee for the Search Engine Marketing Professional Organization (SEMPO). He has received **several awards and honors**, including an ACM Research Award and six application development awards, along with other writing, publishing, research, teaching, and leadership honors.

He has served as a Senior Fellow at the **Pew Research Center** with the Pew Internet and American Life Project and a university expert with the **National Ground Intelligence Center**. He is a Principle Scientist at the Qatar Computing Research Institute.

He has done several **consulting projects** (log analysis, statistical analysis) and **expert witnesses** cases (patent litigation, civil litigation, and class action suits) in the areas of keyword advertising, web analytics, co-registration, domain parking, webpage access, webpage history, and online advertising click fraud.

Education

Ph.D. Computer Science, August 1999 - May 1996 **Texas A&M University**, College Station, Texas 77843

Dissertation: A Software Agent for Performance Improvement of an Existing Information

Retrieval System Advisor: Dr. Udo Pooch

M.CS. Computer Science, May 1996 - June 1994 **Texas A&M University**, College Station, Texas 77843

Research Area: Network Performance and Monitoring

M.S. International Relations, August 1994 - June 1992 **Troy State University**, European Division Research Thesis: National Competitive Advantage

B.S. Computer Science, May 1985 - June 1981 **United States Military Academy**, West Point, New York 10996

Engineering Sequence: Electrical Engineering

| Academic Appointments | | |
|-----------------------|--|--|
| Current - 2014 | Full Professor , College of Information Sciences and Technology, The Pennsylvania State University, University Park, PA, 16802, USA. | |
| Current - 2015 | Principal Scientist , Qatar Computing Research Institute (QCRI), Hamad Bin Khalifa University, Doha, Qatar | |
| 2014 - 2011 | University Researcher , National Ground Intelligence Center, 2055 Boulders Road, Charlottesville, VA 22911 | |
| 2014 - 2009 | Associate Professor , College of Information Sciences and Technology, The Pennsylvania State University, University Park, PA, 16802, USA. | |
| 2012 - 2010 | Senior Fellow, Pew Internet and American Life Project, Pew Research
Center, 1615 L Street, NW Suite 700 Washington, DC 20036 | |
| 2009 - 2003 | Assistant Professor , College of Information Sciences and Technology, The Pennsylvania State University, University Park, PA, 16802, USA. (Previously, School of Information Sciences and Technology) | |
| 2003 - 2001 | Instructor, School of Information Sciences and Technology, The Pennsylvania State University, University Park, PA, 16802, USA | |
| 2000 - 1999 | Lecturer , Computer Science Program, University of Maryland (Asian Division), Seoul, 104-022, Republic of Korea | |
| 1999 - 1998 | Assistant Professor, Department of Electrical Engineering and Computer Science, United States Military Academy, West Point, New York, 10996 | |
| 1998 - 1996 | Lecturer , Department of Electrical Engineering and Computer Science, United States Military Academy, West Point, New York, 10996, USA. | |

Honors and Awards

- **2016 President's Award for Engagement with Students**, The Pennsylvania State University, University Park, Pennsylvania.
- **Best Paper**: Liu, Z. and **Jansen**, **B. J.** (2015) Subjective versus Objective Questions: Perception of Question Subjectivity in Social Q&A. 2015 International Conference on Social Computing, Behavioral-Cultural Modeling, and Prediction (SBP15). Washington DC, p. 131-140. 31 Mar.-3 Apr.
- **Teaching and Learning with Technology Fellow** at Penn State (May 2011 May 2012). Teaching research fellowship to develop subject-based learning apps that leverage cellular technology, the contextual (location-aware) attributes of mobile technology, and social media. See tlt.its.psu.edu/2011/07/24/jim-jansen/

Honors and Awards

- 2011 Paper Award: The article, *The Seventeen Theoretical Constructs of Information Searching and Information Retrieval*, published in <u>Journal of the American Society for Information Science and Technology</u> selected as **John Wiley Best JASIST Paper Award 2011** (see http://www.asis.org/awards/jasis_paper.html).
- 2010 Emerald Literati Network **2010 Award for Excellence for Outstanding Reviewer** for the journal <u>Internet Research</u> (http://info.emeraldinsight.com/authors/literati/index.htm)
- 2008 Best Paper, Jansen, B. J., Zhang, M., and Schultz, C. (2008) The Effect of Brand on the Evaluation of IT System Performance. Proceedings of the Southern Association for Information Systems Conference, Richmond, VA, USA 13-15 March 2008
- 2008 Presented with a Google Faculty Research Award (\$50,000)
- 2007 Article selected as **Highly Commended Winner** at the Emerald Literati Network Awards for Excellence 2007. Spink, A. and Jansen, B. J. (2006) Searching multiple federate content Web collections, Online Information Review. 30(5), 485-495.
- 2004 Worldwide press coverage for book <u>Web Search: Public Searching of the Web</u>, coauthored with Dr. Amanda Spink. Including AP, Yahoo! News, CNN, MSN, and numerous other television, radio, Web, and print outlets.
- Worldwide press coverage and interviews 6/30/2003-7/3/2003 reference article: Jansen, B. J., and Spink, A. (2003) An analysis of Web pages retrieved and viewed, IC'03: Internet Computing: Web Mining Session, Las Vegas, 4-6 June, 2003. Including: BBC, Irish Radio, Washington Times, Psychology Today, and several U.S. radio stations.
- 2003 **ISI Most Highly Cited Articles in Field of Web Searching** for the manuscript Jansen, B. J., Spink, A., and Saracevic, T. (2000) *Real Life, Real Users, and Real Needs: A Study and Analysis of User Queries on the Web*, <u>Information Processing & Management</u>. 38(2), 207-227.

The article was identified in May 2003 by ISI Essential Science Indicators to be one of the most cited papers in the research area of Web Searching Behavior.

- 2002 **Highly Commended Article** invited for journal publication. Jansen, B. J. (2002) *Towards Implementing a Cognitive Model of Searching*, Proceedings of the E-Learning 2002 Conference (Web Track), Montreal, Canada. 15-19 October.
- 2002 Two Crystal Awards of Excellence for outstanding software development in the communications field.

Honors and Awards

2002 Worldwide press coverage and interviews 3/31/02- 4/5/02 reference article: Spink, A., Jansen, B. J., Wolfram, D., and Saracevic, T. (2002). From e-sex to e-commerce: Web search changes, IEEE Computer, 35(3), 133-135.

Including: Associated Press, BBC, CBC, MSNBC, Wall Street Journal, New York Times, PC World, CNN, Chinese People's Daily, Toronto Star, US News and World Report, San Francisco Chronicle, The Independent (UK), Business Week, Washington Post, Financial Times (UK), Information Week, Web, TV, newspaper (200+) and magazine media.

- 2002 Award of Distinction for interactive Web site development.
- 2002 Two Awards of Excellence for exceptional multimedia application development.
- 2002 US Army War College **Team of the Year** for outstanding contributions as team manager.
- 2001 U.S. Army Visual Information Award for multimedia development.
- 2000 **Highly Commended Award** by MCB Publishers, for: Spink, A., Bateman, J., and Jansen, B. J. (1999) Searching the Web: A survey of Excite users, <u>Journal of Internet</u> Research: Electronic Networking Applications and Policy, 9(2), 117-128.
- 1998 **Top Paper Award** for: Spink, A., Bateman, J., and Jansen, B. J. (1998) *Users'* searching behavior on the Excite Web search engine, 1999 World Conference on the WWW and Internet, Orlando, Florida.
- 1997 ACM Student Research Award for: Jansen, B. J. (1997) Simulated Annealing for Query Results Ranking, Computer Science Education Conference, San Jose, CA. 28 – 30 February.
- 1992 Writing and Research Award, U.S. Marine Corps University.
- 1992 Research Award from U.S. Army Trainer Journal

Books

Jansen, **B. J.** (2011). <u>Understanding Sponsored Search: Coverage of the Core Elements of Keyword Advertising</u>. Cambridge University Press: Cambridge, UK.

Jansen, B. J. (2009) <u>Understanding User – Web Interactions via Web Analytics</u>. Morgan-Claypool Lecture Series. Marchionini, G. (Ed). Morgan-Claypool: San Rafael, CA.

Jansen, B. J., Spink, A., and Taksa, I. Editors. (2009) <u>Handbook of Research on Web Log Analysis</u>, Hershey, PA: Idea Group Publishing.

Books

Spink, A., and **Jansen, B. J.** (2004) <u>Web Search: Public Searching of the Web</u>, Dordrecht: Kluwer Academic Publishers.

Parts of Books

Jansen, **B. J.** (2016) *Log Analysis*. Research Methods in Library and Information Science. Libraries Unlimited.

Mukherjee, P, Kozlek, B., Gyorke, A., Camplese, C. and **Jansen, B. J.** (2014) Leveraging Mobile Technology to Enhance Both Competition and Cooperation in an Undergraduate STEM Course. Innovative Practices in Teaching Information Sciences and Technology: Experience Reports and Reflections. p. 167-178. New York: Springer.

Reddy, M. C., **Jansen, B. J.**, Spence, P. R. (2010) *Collaborative Information Behavior: Exploring Collaboration and Coordination During Information Seeking and Retrieval Activities.* Foster, J. (Ed.), <u>Collaborative Information Behavior: User Engagement and Communication Sharing.</u> p. 73 - 88. Hershey, PA: IGI.

Booth, D., and **Jansen, B. J.** (2009) *A review of methodologies for analyzing Websites*. In B. J. Jansen, A. Spink & I. Taksa (Eds.), <u>Handbook of Web Log Analysis</u>. p. 143-164. Hershey, PA: IGI.

Jansen, **B. J.** (2009) *The methodology of search log analysis*. In B. J. Jansen, A. Spink & I. Taksa (Eds.), <u>Handbook of Web log analysis</u>. p. 100-123. Hershey, PA: IGI.

Jansen, B. J., Taksa, I., and Spink, A. (2009) *Research and methodological foundations of transaction log analysis*. In B. J. Jansen, A. Spink & I. Taksa (Eds.), <u>Handbook of Web Log Analysis</u>. p. 1-17. Hershey, PA: IGI.

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Kwon, S., Abbar, S. and **Jansen**, **B. J.** (2016) *Identifying Virality Attributes of Arabic Language News Articles*. Qatar Foundation Annual Research Conference 2016 (ARC'16), Doha, Qatar. 22 March.

An, J., Kwan, H., Cho, H., Hassen, M.Z., and **Jansen**, **B. J.** (2016) *Efforts Towards Automatically Generating Personas in Real-time Using Actual User Data*. Qatar Foundation Annual Research Conference 2016 (ARC'16), Doha, Qatar. 22 March.

Mukherjee, P. and Jansen, B. J. (2015) Correlation of Brand Mentions in Social Media and Web Searching Before and After Real Life Events: Phase Analysis of Social Media and Search Data for Super Bowl 2015 Commercials. 1st International Workshop on Event Analytics using Social Media Data at The IEEE International Conference on Data Mining series (ICDM 2015), Atlantic City, New Jersey, USA, 14 Nov.

Mukherjee, P. and Jansen, B. J. (2015) *Analyzing the Social Soundtrack From Second Screens Before, During, and After Real-life Events*. The First International Workshop on Online Social Networks Technologies, 2015 IEEE Jordan Conference on Applied Electrical Engineering and Computing Technologies (AEECT), Dead Sea, Jordan. 3-5 Nov.

- Jansen, B. J., Wong, J. S., Jablokow, K.W., Divinsky, A., Liu, Z., and Pursel, B. (2014) Classifying MOOC Discussion Forum Posts as Information Seeking Interactions and Levels of Cognitive Learning. Workshop on Learning at Scale at ACM CHI Conference on Human Factors in Computing Systems, (CHI 2014), Toronto, CA. 26 April 1 May.
- Liu, Z. and Jansen, B. J. (2012) Factors Influencing the Response Rate in Social Question and Answering Behavior. Workshop on Social Media Question Asking at 16th ACM Conference on Computer Supported Cooperative Work and Social Computing (CSCW 2013). 23-27 February. San Antonio, Texas.
- Jansen, B. J. (2012) Gender Demographic Targeting in Sponsored Search. INFORMS International 2012. 24-27 June. Beijing, China.
- **Jansen, B. J.** (2012) *Using Mobile Apps to Enhance Classroom Learning*. Teaching and Learning with Technology, University Park, PA, 24 March
- Rosso, M. and **Jansen, B. J.** (2010) *Smart Marketing or Bait & Switch? Competitors' Brands as Keywords in Online Advertising*. 4th Workshop on Information Credibility on the Web (WICOW 2010). World Wide Web Conference (WWW 2010), Raleigh, NC. 26-30 April.
- **Jansen, B. J.** (2009) System Controlled Assistance for Improving Search Performance. Human-Computer Interaction and Information Retrieval. Workshop. Washington, DC. 23 October.
- Jansen, B. J., Zhang, M, Sobel, K, and Chowdury, A, (2009) The Commercial Impact of Social Mediating Technologies: Micro-blogging as Online Word-of-Mouth Branding. ACM Conference on Computer Human Interaction (CHI2009). Boston, Massachusetts. 4 9 April.
- Neale, L., Hunter, L., **Jansen, B. J.**, Murphy, J. (2008) *The Google Online Marketing Challenge: A Global Teaching and Learning Initiative*. 2008 Society for Marketing Advances Annual Conference. 4-9 November. St Petersburg, Florida.
- Jansen, B. J., Rosso, M., Russell, D., and Detlor, B. (2008) The Google Online Marketing Challenge: A Multi-Disciplinary Global Teaching and Learning Initiative Using Sponsored Search. 2008 Annual Meeting of the American Society for Information Science and Technology. 24-29 October Columbus, Ohio.
- **Jansen, B. J.** (2008). *Viewing Searching Systems as Learning Systems*. Second Workshop on Human-Computer Interaction and Information Retrieval. 23 October. Redmond, Washington.
- Murphy, J., Canhoto, A., Hofacker, C., Hunter, L., **Jansen, B. J.**, and Voorhees, C. (2008) *The Google Online Marketing Challenge: A Global Teaching and Learning Initiative*. 2008 American Marketing Association Summer Marketing Educators' Conference. 8-11 August. San Diego, California.

Reddy, M. and **Jansen, B. J.** (2008) *Learning about Potential Users of Collaborative Information Retrieval Systems*. Workshop on Collaborative Information Retrieval, Joint Conference on Digital Libraries (JCDL 2008). 19 June. Pittsburgh, Pennsylvania.

Jansen, B. J., Bhavnani, S., Murray, G. C., Spink, A. and Wolfram, D. (2007) *Web Log Analysis Panel*, 2007 Annual Meeting of the American Society for Information Science and Technology. Milwaukee, Wisconsin. 18-25 October.

Spink, A. and **Jansen**, **B. J.** (2007) *Web Research - Results from Large-Scale Web Data Analysis*, ARC Research Network Enterprise Information Infrastructure Workshop on Data From the Field. Sydney, Australia. 24th May.

Jansen, B. J. and Spink, A. (2007) *The Effect on Click-through of Combining Sponsored and Non-Sponsored Search Engine Results in a Single Listing*, 16th International World Wide Web Conference (WWW2007) Workshop on Sponsored Search Auctions. Banff, Canada. 8-12 May.

Paper: http://opim.wharton.upenn.edu/ssa3/pdf/submission_96.pdf

Jansen, B. J. (2007) *Preserving the Collective Expressions of the Human Consciences*, 16th International World Wide Web Conference (WWW2007) Workshop on Query Log Analysis: Social and Technical Challenges. Banff, Canada. 8-12 May.

Paper: http://www2007.org/workshops/paper 58.pdf

Slides: http://querylogs2007.webir.org/slides/JimJansenQL2007.pdf

Jansen, B. J., Smith, B., and Booth, D. (2007) *Learning as a Paradigm for Understanding Exploratory Search*, Conference on Human Factors in Computing Systems (SIGCHI), Workshop on Exploratory Search Interfaces. San Jose, California. 28 April - 3 May.

Spink, A., Alvarado-Albertorio, F., and **Jansen, B. J.** (2007) *Web Search Behavior: What is Normative?*, Society of Australasian Social Psychologists (SASP) Conference. Brisbane, Australia. 12 – 15 April.

Jansen, B. J. and Spink, A. (2006) *Characteristics of searching on Web meta-search engines*, American Society for Information Science and Technology: Human Computer Interaction Workshop. Austin, TX. 3-9 November.

Jansen, B. J. (2006) Implications of Trust of Sponsored Links for E-commerce Web Searching, 6th Annual SIG-USE Research Symposium. American Society for Information Science and Technology (ASIS&T) Annual Conference. Austin, TX. 4 November.

Spink, A. and **Jansen, B. J.** (2006) *Web Searching: Trends and Impacts,* Oxford Internet Institute International Symposium. Journal of Information, Communication, Society: 10th Anniversary International Symposium. University of York, UK. 20 – 22 September. http://www.york.ac.uk/res/siru/icsspinketal.htm

- Jansen, B. J., Spink, A., Kathura, V., and Koshman, S. (2006) *How to Define Searching Sessions on Web Search Engines*, Workshop on Web Mining and Web Usage Analysis. The 12th ACM SIGKDD International Conference on Knowledge Discovery and Data Mining (KDD 2006). Philadelphia, Pennsylvania. 20-23 August.
- Jansen, B. J. (2006) Adversarial Information Retrieval Aspects of Sponsored Search, Second International Workshop on Adversarial Information Retrieval on the Web (AIRWeb 2006). The 29th Annual International ACM SIGIR Conference on Research & Development on Information Retrieval (SIGIR2006). Seattle, Washington. 6-11 August.
- **Jansen, B. J.**, Ramadoss, R. Zhang, M., and Zang, N. (2006) *Wrapper: An Application for Evaluating Exploratory Searching Outside of the Lab*, SIGIR 2006 Workshop on Evaluating Exploratory Search Systems. The 29th Annual International ACM SIGIR Conference on Research & Development on Information Retrieval (SIGIR2006). Seattle, Washington. 6-11 August.
- Buzikashvili, N. and **Jansen**, **B. J.** (2006) *Limits of the Web Log Analysis Artifacts*, Workshop on Logging Traces of Web Activity: The Mechanics of Data Collection, The Fifteenth International World Wide Web Conference (WWW 2006). Edinburgh, Scotland. 22-26 May.
- Jansen, B. J. (2006) The Wrapper: An Open Source Application for Logging User System Interactions during Searching Studies, Workshop on Logging Traces of Web Activity: The Mechanics of Data Collection. The Fifteenth International World Wide Web Conference (WWW 2006). Edinburgh, Scotland. 22-26 May.
- Jansen, B. J., Rieh, S.Y., Spink, A., Wang, P., and Wolfram, D. (2005) *Panel Presentation: Internet Usage Transaction Log Studies: The Next Generation*, American Society for Information Science & Technology 2005 Annual Meeting. Charlotte, North Carolina. 28 October 2 November.
- Toms, E.L., **Jansen, B. J.**, and Muresan, G. (2005) *Panel Presentation: Evaluating Success in Search Systems*, American Society for Information Science & Technology 2005 Annual Meeting. Charlotte, North Carolina. 28 October 2 November.
- **Jansen, B. J.** (2005) A Multi-Disciplinary, Multi-Level, and Multi-Spectrum View of Interaction, The First Conference of the i-School Community: Bridging Disciplines to Confront Grand Challenges. 28-30 September 2005, State College, PA.
- **Jansen, B. J.** and Resnick, M. (2005) *Examining Searcher Perceptions of and Interactions with Sponsored Results*, Workshop on Sponsored Search Auctions, The Sixth ACM Conference on Electronic Commerce (EC'05). Vancouver, Canada. 5-8 June.
- **Jansen, B. J.** (2005) *Automated Searching Assistance for Exploratory Search,* Seminar on Exploratory Search Interfaces at the University of Maryland sponsored by the Human-Computer Interaction (HCI) Lab. College Park, Maryland. 2 June.

Shingle, A. **Jansen**, **B. J.**, and Spink, A. (2005) *Television Advertising of Prescription Drugs:* A Study of Its Effect on Consumer Web Searching, IEEE 6th International Conference on Information Technology, Coding and Computing. Las Vegas, Nevada, 11-13 April, 2005.

Jansen, B. J., Spink, A., and Pederson, J. (2004) An Analysis of Multimedia Searching on AltaVista, Presentation at Workshop on User Searching, World Wide Web Conference, New York, New York, 18 May 2004.

De Ycaza, S., Doran, S., Eastman, C., and **Jansen, B. J.** (2003) Nutritional Information on the Web: An Analysis of Information Sought and Information Provided, South Carolina Nutrition Research Summit, Columbia, SC. 17 October 2004.

Jansen, B. J. (1998) An Analysis of User Queries on the Web: The Implications for the Design of Military Information Retrieval Systems, Fifth Annual US Army Research Laboratory and United States Military Academy Technical Symposium, West Point, New York.

Jansen, B. J. (1997) Simulated Annealing in Information Retrieval, Fifth Annual US Army Research Laboratory and United States Military Academy Technical Symposium, West Point, New York.

Adams, W. J. and **Jansen, B. J.** (1997) *Integrating Usability Design Principles into an Existing Engineering Curriculum*, The American Society for Engineering Education National Conference, Milwaukee, Wisconsin.

Jansen, B. J. and Adams, W. L. (1997) *Integrating User Centered Design into an Introductory Engineering Course*, American Society for Engineering Education Zone 1 Meeting, West Point, New York.

Scholarly Reports

Jansen, B. J. (2011) *The civic and community engagement of religiously active Americans*. Pew Internet & American Life Project, Pew Research Center. 13 December. http://pewinternet.org/Reports/2011/Social-side-of-religious.aspx

Jansen, B. J. (2010) 65% of Internet Users Have Paid for Online Content. Pew Internet & American Life Project, Pew Research Center. 30 December. http://www.pewinternet.org/Reports/2010/Paying-for-Content.aspx

Jansen, B. J. (2010) Use of the internet by higher income households. Pew Internet & American Life Project, Pew Research Center. 24 November. http://www.pewinternet.org/Reports/2010/Better-off-households.aspx

Jansen, B. J. (2010) *Online Product Research*. Pew Internet & American Life Project, Pew Research Center. 29 September.

http://pewinternet.org/Reports/2010/Online-Product-Research.aspx

| Funded Projects, Grants, Commissions, and Contracts | | |
|---|---|--|
| 2015 - 2014 | Title: Web Analytics for a Research University Library Granting Agency: Penn State, University Library Total Amount: \$19,717 Role: Principal Investigator | |
| 2015 - 2013 | Title: Exploring Scholarly Discourse in MOOC Discussion Forums Granting Agency: Penn State, Center for Online Innovation in Learning Total Amount: \$30,383 Role: Principal Investigator | |
| 2014 - 2010 | Title: Broadband to Support SMEs in Pennsylvania Granting Agency: Commonwealth of Pennsylvania Total Amount: \$500,000 Role: Faculty Investigator (\$70,000) | |
| 2014 - 2010 | Title: Semantic CiteSeerX Granting Agency: National Science Foundation Total Amount: \$1,100,000 Role: Principal Investigator (\$130,000) | |
| 2011 - 2008 | Title: Affective and Cognitive Factors Affecting the Evaluation of Search Engines by Users Granting Agency: Google Amount: \$50,000 Role: Principal Investigator | |
| 2011 - 2009 | Title: Using Keyword Advertising for Economic and Workforce Development Granting Agency: The Pennsylvania State University Amount: \$25,000 Role: Principal Investigator | |
| 2011 - 2010 | Title: Toolkits for Deployable Best Practices Granting Agency: Office of Naval Research STTR Phase II Total Amount: \$750,000 Role: Principal Investigator (\$87,500) | |
| 2011 - 2010 | Title: RAPID: Text Message-based Infrastructure for Emergency Response Granting Agency: National Science Foundation Total Amount: \$75,000 Role: Principal Investigator (\$15,000) | |

| Funded Project | ts, Grants, Commissions, and Contracts |
|----------------|--|
| 2009 - 2008 | Title: Toolkits for Deployable Best Practices Granting Agency: Office of Naval Research STTR Phase I Total Amount: \$100.000 Role: Principal Investigator (\$15,000) |
| 2009 - 2007 | Title: REU Supplement for CRI: Collaborative: Next Generation CiteSeer Granting Agency: National Science Foundation Amount: \$12,000 Role: Co-Principal Investigator (\$12,000). |
| 2009 - 2006 | Title: Synchronized Interactions Among Users, Systems, and Information Granting Agency: Air Force Research Lab Amount: \$463,000 Role: Principal Investigator (\$463,000). |
| 2008 - 2005 | Title: The Next Generation CiteSeer Granting Agency: National Science Foundation Amount: approximately \$1,444,984 Role: Co-principal Investigator with Dr. Lee Giles, Dr. Susan Gauch, and Dr. Jack Carroll (\$48,701) |
| 2009 - 2007 | Title: Triggers in Collaborative Information Searching Granting Agency: National Science Foundation Amount: \$76,000 Role: Co-principal Investigator with Dr. Madhu Reddy (\$18,119) |
| 2009 - 2008 | Title: REU Supplement for Triggers in Collaborative Information Searching Granting Agency: National Science Foundation Amount: \$12,000 Role: Co-principal Investigator with Dr. Madhu Reddy (\$6,000) |
| 2007 - 2006 | Title: REU Supplement for CRI: Collaborative: Next Generation CiteSeer Granting Agency: National Science Foundation Amount: \$9,000 Role: Co-Principal Investigator (\$9,000). |
| 2005 - 2004 | Title: Design of Tools for Information Seeking, Management, and Analysis for a Lessons Learned Knowledge System Granting Agency: US Marine Corps Research University Amount: \$500,000 Role: Co-Principal Investigator (\$83,957) |

| Funded Projects | s, Grants, Commissions, and Contracts |
|-----------------|---|
| 2005 | Title: Knowledge Management Granting Agency: US. Department of Defense, Defense Threat Reduction Agency (DTRA) Amount: \$625,832 Role: Co-Principal Investigator (\$18,439). |
| 2006 - 2005 | Title: REU Supplement for CRI: Collaborative: Next Generation CiteSeer Granting Agency: National Science Foundation Amount: \$6,000 Role: Co-Principal Investigator (\$6,000). |
| 1998 -1996 | Title: The use of software agents in information retrieval. Granting Agency: Army Research Laboratory Amount: \$68,000 Role: Principal Investigator (\$68,000) |
| 1998 | Title: Information Searching on Web Search Engines Granting Agency: Army Research Laboratory Amount: \$5,000 Role: Principal Investigator (\$5,000) |
| 1997 | Title: Software agents for information retrieval. Granting Agency: Army Research Laboratory Amount: \$5,000 Role: Principal Investigator (\$5,000) |

Software Developed

Software Development: Client-side Application for Automated Searching: that automates searching tactics via user implicit feedback.

Software Development: Application for Real-time Evaluation of Search Engine Performance: that automates the evaluation of Web search engines.

Teaching

At *The Pennsylvania State University* (current – 2002), I have taught a variety of information technology-related courses, including the undergraduate capstone project leadership course, the introductory freshman course, online marketing, graduate seminar course, and a graduate course on human information interaction. Additionally, I have mentored students in a variety of independent studies and have been on several course development committees.

At The Pennsylvania State University (current - 2002):

Teaching

- Committee Lead, curriculum development team for a college-level executive masters program.
- Committee Lead, curriculum development committee for re-design of the undergraduate senior – level capstone course.
- Committee Member, curriculum development team for re-design of the undergraduate freshmen level introductory course.
- Committee Member, curriculum development team for the establishment of a university-wide Business Analytics minor
- Faculty Lead, development team for the establishment of a university-wide professional library certification program
- Committee Member, curriculum development team for the establishment of a college Entrepreneurship minor
- Course Development: (1) undergraduate capstone course in IT project management, (2) graduate course in information searching, (3) undergraduate course in keyword advertising, (4) graduate course in web analytics, (5) undergraduate course in entrepreneurship technology
- 2015 Mentor for one team in the **Google Final 15 in The Google Online Marketing Challenge** for 2014. The team was in the top fifteen from 4,000 teams from around the world (top 0.4%).
 - Mentor for team in the **Google Non-profit Challenge** for 2014. The teams were the top more than 4,000 teams from around the world (top 0.4%).
- 2014 Mentor for three teams in the **Global Final 15 in The Google Online Marketing Challenge** for 2013. The teams were in the top fifteen from 4,000 teams from around the world (top 0.4%).
 - Mentor for two teams in the **Google Media Marketing Challenge** for 2013. The teams were the top more than 4,000 teams from around the world (top 0.4%).
- 2013 Mentor for one team in the Global Final 15 in The Google Online Marketing Challenge for 2012. The team was in the top fifteen from more than 4,000 teams from around the world (top 0.4%).
- 2012 Mentor for three teams in the **Global Final 15 in The Google Online Marketing Challenge** for 2011. The three teams were in the top fifteen from 4,000 teams from around the world (top 0.4%).
- 2010 Mentor for two teams in the **Global Final 15 in The Google Online Marketing Challenge** for 2009. The two teams were in the top fifteen from 3,000+ teams from around the world (top 0.5%).

Had eight other teams get honorable mention by placing in the Top 100 Global Teams and five other teams place in the Top 10% of all teams.

Teaching

- 2010 Mentor for two student teams that took 1st and 3rd in the **Penn State IdeaPitch Competition**, which is a university wide Penn State entrepreneurship competition.
- 2009 Mentor for three teams in the Global Final 15 in The Google Online Marketing Challenge for 2009. The three teams were in the top fifteen from 2,107 teams from around the world.

Had seven other teams get honorable mention by placing in the top 50 teams in the Americas region.

- 2009 **Schreyer Honors College Teaching Grant** Recipient for developing multi-disciplinary keyword advertising, marketing, and technology course.
- 2008 Mentor for the winning team in the Americas region in The Google Online Marketing Challenge for 2008. One of the top four teams from 1,620 teams from around the world. Won a trip to the GooglePlex with the students, plus the students all won laptops.

Had two other teams get honorable mention by placing in the top 50 teams in the Americas region.

- 2008 Selected as Faculty Marshall by Student Marshall of Computer Science and Engineering Department, College of Engineering, The Pennsylvania State University as faculty member who had the biggest impact on student's academic career
- 2008 Professor of the Year nominee for College of Information Sciences and Technology, The Pennsylvania State University, 16802
- 2003 Selected as Faculty Marshall by Student Marshall of School of Information Sciences and Technology, The Pennsylvania State University as faculty member who had the biggest impact on student's academic career

Guest lecturer for a month (2000) at the Korean Military Academy in Seoul, Republic of Korea.

At the *University of Maryland* (Asian Division) (2000 – 1999), taught courses on Web/Internet and multimedia design.

At the *United States Military Academy* (1999 – 1996), I taught several computer science-related courses including introductory programming, advanced programming, microcomputing, and databases. Also, mentored students in a variety of independent studies.

As executive officer for the department (1999 – mid 1997), was responsible for course scheduling, instructor assignments, classroom allocation, student counseling, as well as many other duties concerning the day-to-day operation of the department.

Membership on Degree Committees

The Pennsylvania State University

College of Information Sciences and Technology

Chair or Co-Chair

Partha Mukherjee (Committee Chair) (PhD degree expected in 2016)

Alex Brown (Committee Chair) (M.S. degree expected in 2016)

Zhe Liu (Committee Chair) (PhD degree conferred in 2014)

Dan Coughlin (Committee Chair) (PhD degree conferred in 2014)

Carolyn Hafernik (Committee Chair) (M.S. degree conferred in 2013)

Adan Ortiz-Cordova (Committee Chair) (M.S. degree conferred in 2013)

Jian-Syuan Wong (Committee Chair [until 2016]) (PhD degree expected in 2018)

Steve Carmen (Committee Chair [until 2013]) (M.S. degree conferred in 2013)

Kathleen Moore (Committee Chair [until 2012]) (PhD degree expected in 2015)

Mimi Zhang (Committee Chair) (PhD degree conferred in 2010)

Mike Hills (Committee Chair) (PhD degree conferred in 2010)

Hyun-Woo Kim (Committee Co-Chair) (M.S. degree conferred in 2010)

Young Shin Kim (Committee Co-Chair) (M.S. degree conferred in 2010)

Committee Member

Eric McMillan (Committee Member) (PhD degree expected in 2017)

Nathan McNeese (Committee Member) (PhD degree conferred in 2014)

Patricia Spence (Committee Member) (PhD degree conferred in 2013)

Arvind Karunakaran (Committee Member) (M.S. degree conferred in 2011)

Yusuf Raza (Committee Member) (M.S. degree conferred in 2009)

Sharoda Paul (Committee Member) (PhD degree conferred in 2009)

Allison Morgan (Committee Member) (PhD degree conferred in 2008)

Mithu Bhattacharya (Candidacy Committee Member, 2005)

Scott Robertson (Candidacy Committee Chair, 2004)

The Pennsylvania State University

Workforce Education and Development Program, College of Education John Dolan (Committee Co-Chair [until 2012]) (PhD degree expected in 2013)

The Pennsylvania State University

School of Hospitality and Management

Lu Zhang (Committee Co-Chair) (M.S. degree conferred in 2009)

The Pennsylvania State University

Department of Industrial and Manufacturing Engineering

Himanshu Sharma (Committee Chair) (M.S. degree conferred in 2005)

Sourav Sengupta (Committee Chair) (M.S. degree conferred in 2005)

Ying Zhang (Committee Chair) (M.S. degree conferred in 2008)

The Pennsylvania State University

Department of Electrical Engineering

Vijay Mohan (Committee Co-Chair) (M.S. degree conferred in 2009)

Dheepak Ramaswamy (Committee Co-Chair) (M.S. degree conferred in 2009)

Ashish Kathuria (Committee Chair) (M.S. degree conferred in 2007)

Membership on Degree Committees

The Pennsylvania State University

Department of Computer Science and Engineering

Yanjun Gao (Committee co-Chair) (PhD degree expected in 2018)

Chandrika Gopalakrishna (Committee Chair) (M.S. degree conferred in 2008)

The University of Pittsburgh

School of Information Sciences

Department of Library and Information Science

Zhen Yue (Committee Member) (Ph.D. degree conferred in 2014)

Minsoo Park (Committee Member) (Ph.D. degree conferred in 2008)

Rutgers, the State University of New Jersey

School of Communication, Information and Library Studies

Yuelin Lee (Committee Member) (Ph.D. degree conferred in 2008)

The Pennsylvania State University

Schreyer Honors College, thesis advising

Megan Krause (B.S. degree expected 2107)

Allie Whitman (B.S. degree expected 2106)

Adan Ortiz-Cordova (B.S. degree conferred 2011)

Bradley Shively (B.S. degree conferred 2010)

Kate Sobel (B.S. degree conferred 2010)

Steven Troxell (B.S. degree conferred in 2008)

Steven Clancy (B.S. degree conferred in 2007)

Paulo Molina (B.S. degree conferred in 2004)

Chris Catalano (B.S. degree conferred in 2004)

Andy Shingle (B.S. degree conferred in 2004)

Supervision of Other Undergraduate Research

| Student
Arielle Amchin
Arun Das | Degree
BS
BS | Major
Marketing
CS | University Penn State Brown University | Role
Research Mentor
Research Mentor |
|---------------------------------------|---------------------------|---------------------------------|---|---|
| Manisha
Dareddy | BS | MIS | Carnegie Mellon Qatar | Research Mentor |
| Satyajit
Narayanan | BS | CS | Bharati Vidyapeeth
University | Research Mentor |
| Will Berkheiser | BS | IST | Penn State | Work Study Mentor http://studentaid.psu.edu/types-of-aid/work-study-and-employment/work-study/about |
| Pat Bonner | BS | IST | Penn State | Research Mentor |
| Danielle Booth | BS | IST | Penn State | Research Mentor |
| Anna Brown | BS | IST | Penn State | Research Mentor |
| Nicole Butera | BS | Chemistry | Penn State | Women in Science and
Engineering Research |

Supervision of Other Undergraduate Research

| Student | Degree | Major | University | Role
(WISER) Mentor |
|--------------------|--------|-------------|------------|--------------------------------|
| Chris | BS | IST | Penn State | http://pa.spacegrant.org/wiser |
| Ciamacca | 50 | 101 | 1 om otato | Research Mentor |
| Karen Lee | BS | IST | Penn State | Research Mentor |
| Dana Kracow | BS | IST | Penn State | Research Mentor |
| Daehee Park | BS | IST | Penn State | Research Mentor |
| Melissa
Reizner | BS | IST | Penn State | Research Mentor |
| Mitchell Rukat | BS | IST | Penn State | Research Mentor |
| Paul Rinaldi | BS | IST | Penn State | Research Mentor |
| Simone
Schuster | BS | Advertising | Penn State | Research Mentor |
| Laura Solomon | BS | Advertising | Penn State | Research Mentor |
| Meng Ting Sun | BS | Accounting | Penn State | Research Mentor |
| Pete Smith | BS | IST | Penn State | Research Mentor |
| Megan Tan | BS | Marketing | Penn State | Research Mentor |
| Courtney
Weaver | BS | IST | Penn State | Research Mentor |

Professional Service

| Editorial Boards | |
|------------------|--|
| Current – 2016 | Editor-in-chief, Information Processing & Management (Elsevier) |
| Current – 2016 | Editorial Board Member, <u>Information Discovery and Delivery</u> |
| Current – 2012 | Editorial Advisory Board Member, Social Networks |
| Current – 2011 | Editorial Advisory Board Member, <u>International Journal of Electronic</u> <u>Business</u> |
| Current – 2009 | Editorial Advisory Board Member, <u>Journal of the American Society for Information Science and Technology</u> |
| Current – 2009 | Editorial Advisory Board Member, <u>Future Internet</u> |
| Current – 2006 | Editorial Panel, International Journal of Internet Science |
| Current – 2006 | Editorial Advisory Board Member, Information Research |
| Current – 2004 | Editorial Advisory Board Member, Information Processing & Management |
| 2016 – 2011 | Editor-in-chief, Internet Research (Emerald) |
| 2011 - 2004 | Editorial Advisory Board Member, <u>Journal of Internet Research</u> |

| Editorial Boards | |
|------------------|---|
| 2010 - 2004 | Editorial Advisory Board Member, <u>Library and Information Science</u>
<u>Journal</u> |
| 2008 - 2004 | Associate Editor (Book Reviews), <u>Information Processing & Management</u> |
| 1996 –1998 | Student Editor, SIG Computer Human Interaction SIGCHI Bulletin |

Professional Service

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- 2016 External Tenure Letter Writer for faculty member of School of Business, McMaster University
- 2016 External Tenure Letter Writer for faculty member of Department of Library and Information Science, The Catholic University of America
- 2015 External Tenure Letter Writer for faculty member of School of Communication and Information, Rutgers University
- 2013 External Tenure Letter Writer for faculty member of College of Information Science and Technology, Drexel University
- 2013 External Tenure Letter Writer for faculty member of Graduate School of Management, University of Haifa
- 2012 External Tenure Letter Writer for faculty member of Faculty of Social Sciences, Barllan University
- 2012 External Tenure Letter Writer for faculty member of Henry B. Tippie College of Business, The University of Iowa
- 2012 External Tenure Letter Writer for faculty member of School of Business, North Carolina Central University
- 2010 External Tenure Letter Writer for faculty member of School of Business Administration, Bar Ilan University, Israel
- 2009 External Tenure Letter Writer for faculty member of Computer Information Systems Department, Bentley University

Ad hoc Reviewing

- 2016 Reviewer, <u>IEEE Systems, Man and Cybernetics</u>, <u>Computers in Human Behavior</u>, <u>International Journal of Human Computer Interaction</u>, <u>Cornell Hospitality Review</u>
- 2015 Reviewer, <u>Transactions on Intelligent Systems and Technology</u>, <u>Journal of Organizational Computing and Electronic Commerce</u>, <u>European Journal of Marketing</u>, <u>Journal of Information Management</u>, <u>Transactions on Management Information Systems</u>
- 2014 Reviewer, MIS Quarterly, Journal of Organizational Computing and Electronic

 Commerce, Computers in Human Behavior, Journal of Documentation, IEEE Systems,

 Man and Cybernetics, Tourism Management
- 2013 Reviewer, <u>Technological Forecasting & Social Change</u>, <u>IEEE Systems</u>, <u>Man and Cybernetics</u>, <u>International Journal of Electronic Commerce</u>, <u>ACM Transactions on the Web</u>, <u>Journal of Interactive Marketing</u>, <u>Journal of Electronic Commerce Research</u> (2x), <u>Electronic Commerce Research</u>, <u>Communications of the Association for Information Systems</u>, <u>Transactions on Computer-Human Interaction</u>, <u>Information Research</u>, <u>Information and Management</u>
- 2012 Reviewer, Electronic Commerce Research, International Journal of Information
 Management, Journal of Information Science, Communication Research, International
 Journal of Internet Science, Journal of Organizational Computing and Electronic
 Commerce, Social Science Computer Review, Information Research, MIS Quarterly,
 Journal of Organizational Computing and Electronic Commerce, Library and
 Information Science, IEEE Transactions on Multimedia, Advances in HumanComputer Interaction (2x), Journal of Theoretical and Applied Electronic Commerce
 Research (3x), ACM Transactions on Computer-Human Interaction
- 2011 Reviewer, <u>IEEE Transactions on Multimedia</u>, <u>Information Technology and People</u>, <u>Journal of Computer-Mediated Communication</u> (2x), <u>Sage Publishing</u>, <u>Electronic Commerce Research</u>, <u>International Journal of Electronic Commerce</u>, <u>Journal of Interactive Marketing</u> (2x), <u>ACM Transactions on the Web</u>, <u>ACM Transactions on Computer-Human Interaction</u>
- 2010 Reviewer, International Journal of Information Management (2x), ACM Transactions on the Web, Social Science Computing Review, MIS Quarterly, International Journal of Human-Computer Studies, PLoS One, Information Research, Netherlands Organisation for Scientific Research, Computing Surveys, Information Sciences, Future Internet, International Information and Library Review, International Journal of Internet Science, Behaviour & Information Technology, Journal of Media Economics

Reviewer Award

2010 Reviewer, Internet Research

2009 Reviewer, <u>The Computer Journal</u>, <u>ACM Transactions on the Web</u>, <u>International</u> <u>Journal of Electronic Commerce</u>, <u>Data & Knowledge Engineering Journal</u>, <u>ACM Transactions on Information Systems</u>

Ad hoc Reviewing

- 2008 Reviewer, <u>Journal of the Academy of Marketing Science</u>, <u>ACM Transactions on the Web</u>, <u>ACM Transactions on Information Systems</u>, <u>Decision Support Systems</u>, <u>New Media & Society</u>, <u>IEEE Internet Computing</u>, <u>Journal of Service Science and Management</u>, <u>IEEE Transactions on Professional Communication</u>, <u>International Journal of Knowledge Management Studies</u>
- 2007 Reviewer, <u>Simulation Modelling Practice and Theory</u>, <u>ACM Transactions on Information Systems</u>
- 2006 Reviewer, <u>Journal of Information Science</u>, <u>ACM Transactions on Information Systems</u>
- 2005 Reviewer, <u>Journal of Medical Internet Research</u>, <u>ACM Transactions on Information Systems</u>
- 2005 Reviewer, <u>IEEE Systems, Man and Cybernetics Journal</u>, <u>Computer Networks Journal</u>
- 2004 Reviewer, <u>Information Retrieval</u>, <u>Information Processing & Management</u>, <u>Journal of Web Engineering</u>, <u>Journal of Library & Information Science Research</u>
- 2003 Reviewer, <u>IEEE Proceedings-Software</u>, <u>Information Processing & Management</u>
- 2002 Reviewer, <u>Journal of Informing Science</u>, <u>Information Processing & Management</u>, <u>The</u> World Wide Web Journal
- 2001 Reviewer, <u>International Journal of Human Computer Studies</u>, <u>Information Processing</u> & Management
- 1999 Reviewer, Information Processing & Management
- 1998 Reviewer, <u>Computer Science Education Journal</u>, <u>Information Processing & Management</u>

Professional Service

Grant Reviewing

- 2015 Reviewer, Qatar Research Program, Qatar Foundation
- 2014 Reviewer, grant panelist for National Science Foundation, CISE Research Infrastructure (CRI) program February 2014.
- 2013 Reviewer for grant proposal for Reviewer, American Association for the Advancement of Science (AAAS) Research Competitiveness Program Grant Proposal for funding through the Maine Technology Institute's Development Awards
- 2012 Reviewer, Army Research Lab Grant Proposal

Grant Reviewing

- 2011 Reviewer, National Science Foundation Grant Proposal
- 2011 Reviewer, American Association for the Advancement of Science (AAAS) Research Competitiveness Program Grant Proposal for funding through the Maine Technology Institute's Development Awards
- 2010 Reviewer, Standard Research Grants program of the Social Sciences and Humanities Research Council of Canada (SSHRC) Grant Proposal
- 2010 Reviewer for grant proposal for Reviewer, American Association for the Advancement of Science (AAAS) Research Competitiveness Program Grant Proposal for funding through the Maine Technology Institute's Development Awards
- 2008 Reviewer, Israel Science Foundation Grant Proposal
- 2007 Reviewer, Air Force Office of Scientific Research Grant Proposal
- 2007 Reviewer, Israel Science Foundation Grant Proposal
- 2004 Grant Reviewer, Arts and Humanities Research Board Grant Proposal, Whitefairs, Lewins Mead, Bristol, UK, BS1 2AE

Professional Service

| Other | |
|-------------------|---|
| 2016 | Special Issue on Computational Advertising, IEEE Intelligent Systems. Guest Editors: Yanwu Yang, Huazhong University of Science and Technology, China; Yinghui Yang, University of California, Davis, US; Bernard J. Jansen, Qatar Computing Research Institute, HBKU; Mounia Lalmas, Yahoo Labs, UK. |
| 2016 – 2007 | Academic Panelist for The Google Online Marketing Challenge (http://www.google.com/onlinechallenge/). Based on registrations from more than 100 countries and more than 11,000 student teams, the Challenge may be the largest, worldwide educational course ever done. |
| 2015 External Exa | aminer for Spanish PhD thesis (Universitat Pompeu Fabra Barcelona) |
| 2014 – 2013 | Faculty Advisor for the Penn State Digital Marketing Association |
| 2012 External Exa | aminer for Australian PhD thesis (Queensland University of Technology) |
| 2012 - 2011 | Member, Research Committee, Search Engine Marketing Professional Organization (SEMPO) |

Other

- 2011 2009 Chair of the American Society for Information Science and Technology (ASIST) Information Science Education Committee
- 2010 Reviewer, Cambridge University Press book proposal
- 2010 Reviewer, Cambridge University Press book proposal
- 2010 External Examiner for Australian PhD thesis (University of Sydney)
- 2009 2006 Chair of the American Society for Information Science and Technology (ASIST) Information Science Education Committee Dissertation Jury
- 2008 External Examiner for Australian PhD thesis (The University of New South Wales)
- 2008 External Examiner for Australian PhD thesis (The University of New South Wales)
- 2008 Guest Editor, <u>International Journal of Electronic Business (IJEB)</u>. Special Issue on Sponsored Search
- 2007 External Examiner for Australian PhD thesis (Monash University)
- 2007 Guest Editor, with Andy Edmond, Kirstie Hawkey, Melanie Kellar, and Don Turnbull.

 Journal of Web Engineering. Special Issue on Logging Traces of Web Activity
- 2006 Guest Editor, <u>Bulletin of the American Society for Information Science and Technology</u>. Special Issue on Paid Search, January 2006
- 1995 -1994 President, Computer Science Graduate Students Association, Texas A&M University, College Station, Texas.

Professional Service

- 2016 Chair, Program Committee, The Second International Workshop on Online Social Networks Technologies (OSNT-2016), 13th ACS/IEEE International Conference on Computer Systems and Applications AICCSA 2016. 29 November 2 December.
- 2016 Chair, Program Committee, The Third International Workshop on Social Networks Analysis, Management and Security (SNAMS - 2016), The 4th International Conference on Future Internet of Things and Cloud (FiCloud-2016), Vienna, Austria. 22-24 August.
- 2016 Reviewer, Papers and Posters, 79th Annual Meeting of the American Society for Information Science and Technology (ASIST 2016). Copenhagen, Denmark. 14-18 October.

- 2015 Program Committee, 7th International Joint Conference on Knowledge Discovery, Knowledge Engineering and Knowledge Management, Lisbon, Portugal. 12-14 Nov.
- 2015 Meta-Reviewer, Papers and Posters, 78th Annual Meeting of the American Society for Information Science and Technology (ASIST 2015). St. Louis, Mo. 6-10 November.
- 2015 Reviewer, ACM CHI Conference on Human Factors in Computing Systems, Seoul, South Korea. 18-23 April.
- 2014 Reviewer, Papers and Posters, 77th Annual Meeting of the American Society for Information Science and Technology (ASIST 2014). Montreal, Canada. 31 October - 4 November.
- 2014 Program Committee: 3rd International Information Systems for Crisis Response and Management Conference (ISCRAM 2014), State College, PA. May 2014.
- 2014 Reviewer, ACM CHI Conference on Human Factors in Computing Systems, Toronto, Canada. 26 April – 1 May.
- 2013 Reviewer, Papers, 76th Annual Meeting of the American Society for Information Science and Technology (ASIST 2013). Montreal, Canada. 1-6 November.
- 2013 Reviewer, Posters, 76th Annual Meeting of the American Society for Information Science and Technology (ASIST 2013). Montreal, Canada. 1-6 November.
- 2013 Reviewer, 22nd International World Wide Web Conference (WWW 2013). 13th-17th, May, Rio de Janeiro, Brazil.
- 2013 Program Committee: European Conference on Information Retrieval (ECIR 2013) Workshop on Group Membership and Search (GRUMPS), 24 March, Moscow, Russia
- 2013 Program Committee: Sixth ACM WSDM Conference on Web Search and Data Mining Workshop on Web Search Click Data, 4-8 February, Rome, Italy.
- 2012 Program Committee: Fourth Information Interaction in Context Conference (IIIX 2012), Nijmegen, the Netherlands, 21-24 August 2012.
- 2011 Session Track Chair, 74th Annual Meeting of the American Society for Information Science and Technology (ASIST 2011). 9-13 October. New Orleans, LA.
- 2011 Program Committee, iConference. Toronto, Canada, 7-10 February.
- 2011 Program Committee: 33rd European Conference on Information Retrieval (ECIR 2011), Best Paper Committee, Dublin, Ireland, 19-21 April 2011

- 2011 Program Committee: 33rd European Conference on Information Retrieval (ECIR 2011), Workshop on Information Retrieval Over Query Sessions, Dublin, Ireland, 19-21 April 2011.
- 2011 Program Committee: 12th ACM Conference on Electronic Commerce (EC11). San Jose, CA. 5-9 June.
- 2011 Program Committee: Conference on Multilingual and Multimodal Information Access Evaluation (CLEF 2011). Amsterdam, the Netherlands, 19-22 September 2011.
- 2011 Program Committee: 33rd European Conference on Information Retrieval (ECIR 2011). Dublin, Ireland. 18-21 April.
- 2010 Program Committee, American Society for Information Science and Technology Annual Meeting 2010. Pittsburgh, PA. 22-27 October.
- 2010 Program Committee: Conference on Multilingual and Multimodal Information Access Evaluation (CLEF 2010). Padua, Italy, 20-23 September.
- 2010 Program Committee: LREC 2010 Workshop on Web Logs and Question Answering (WLQA2010). Malta, 22 May.
- 2010 Program Committee: 32st European Conference on Information Retrieval (ECIR 2010). Keynes, UK. 28-31 March.
- 2009 Program Committee: Web Information and Data Management. 19th International Conference on Information and Knowledge Management (CIKM 2009). Hong Kong. 6 November.
- 2009 Program Committee: Workshop on the Analysis of System Logs. 22nd ACM Symposium on Operating Systems Principles. Big Sky, MT.14 October.
- 2009 Program Committee: Collaborative Information Behavior. GROUP 2000. Sanibel Island, Florida. 10 May.
- 2009 Program Committee: Qualitative and Quantitative Methods in Libraries International Conference (QQML2009). Chania, Crete, Greece, 26-29 May.
- 2009 Program Committee: 31st European Conference on Information Retrieval (ECIR 2009). Toulouse, France. 6-9 April.
- 2009 Reviewer, ACM Conference on Computer Human Interaction 2009 (CHI 2009), Boston, MA, 4 – 9 April.
- 2008 Reviewer, 18th Conference on Information and Knowledge Management (CIKM 2008). Napa Valley, California. 26-30 October.

- 2008 Program Committee: Workshop on Human-Computer Interaction and Information Retrieval (HCIR 2008). Redmond, Washington.23 October.
- 2008 Program Committee: 1st Information Interaction in Context Symposium (IiiX 2008). London, United Kingdom. 14-17 October.
- 2008 Program Committee: 2008 Ad Auctions Workshop. ACM Conference on Electronic Commerce in Chicago, IL. 8-9 July.
- 2008 Reviewer, Southern Association for Information Systems Conference (SAIC 2008), Richmond, VA, USA 13–15 March.
- 2007 Program Committee, IEEE International Conference on Intelligence and Security Informatics 2007 (ISI 2007), New Brunswick, New Jersey. 23-24 May, 2007
- 2007 Reviewer, Graphics Interface 2007, Montréal, Canada, 28 30 May 2007.
- 2007 Reviewer, American Society for Information Science and Technology Annual Meeting 2007. Milwaukee, Wisconsin. 18-25 October.
- 2007 Program Committee, 8th World Congress on the Management of eBusiness. Toronto, Canada. 11-13 July.
- 2007 Program Committee, WWW'07 Workshop on Query Log Analysis: Social and Technological Challenges. World Wide Web 2007, Banff, Alberta, Canada. 8 May.
- 2007 Program Committee, WWW'07 Workshop on Sponsored Search. World Wide Web 2007, Banff, Alberta, Canada. 8 May.
- 2007 Program Committee, Chi'07 Workshop on Exploratory Search and HCI: Designing and Evaluating Interfaces to Support Exploratory Search Interaction. ACM CHI2005, Conference on Human Factors in Computing Systems (CHI'07), San Jose, CA. 29 April 2007.
- 2007 Program Committee, IEEE Intelligence and Security Informatics Conference (ISI 2007), New Brunswick, NJ. 23 24 May, 2007.
- 2006 Program Committee: 2006 Research Symposium of the Special Interest Group on Human-Computer Interaction. American Society for Information Science and Technology. Austin, Texas. 5 November 5, 2006
- 2006 Reviewer, Hawaii International Conference on System Sciences 2007. Waikoloa, Big Island, Hawaii. 3-6 January, 2007.
- 2006 Program Committee: IEEE Information Technology: New Generations (ITNG) 2006, Las Vegas, NV. 16 -19 April 2007.

- 2006 Reviewer for SIGIR 2006 Workshop on Evaluating Exploratory Search Systems. The 29th Annual International ACM SIGIR Conference on Research & Development on Information Retrieval (SIGIR2006). 6-11 August. Seattle, Washington.
- 2006 Program Committee: 4th International Conference on Information Technology: New Generations, 16-19 April, 2007, Las Vegas, Nevada.
- 2006 Program Committee: 1st Information Interaction in Context Symposium (IiiX symposium). Copenhagen, Denmark. 18-20 October 2006.
- 2006 Program Committee: IEEE Information Technology: New Generations (ITNG) 2006, Las Vegas, NV. 10 – 12 April 2006.
- 2006 Reviewer, The Fourth Annual Pre-ICIS Workshop on HCI Research in MIS, International Conference on Information Systems, 2005.
- 2006 Reviewer, Human Factors and Ergonomics Society 49th Annual Meeting, 2005.
- 2006 Program Committee: IEEE 6th International Conference on Information Technology, Coding and Computing. Las Vegas, Nevada. 5-7 April 2005.
- 2006 Program Committee: the 5 h International Conference on Conceptions of Library and Information Science, Glasgow, Scotland, 6-9 June 2005.
- 2006- 2002 Reviewer, ACM SIGIR International Conference on Information Retrieval.
- 2006 Session Track Co-chair, Web Searching Sessions (Three tracks), the IEEE 5th International Conference on Information Technology, Coding and Computing. Las Vegas, Nevada. 4-6 April 2005.
- 2005 Program Committee, IEEE 6th International Conference on Information Technology, Coding and Computing. Las Vegas, Nevada. 5-7 April, 2005.
- 2005 Program Committee, the 5^h International Conference on Conceptions of Library and Information Science, Glasgow, Scotland, 6-9 June 2005.
- 2004 Session Track Co-chair, Web Searching Sessions (Three tracks), the IEEE 5th International Conference on Information Technology, Coding and Computing. Las Vegas, Nevada. 5-7 April, 2004.
- 2004 Reviewer, ACM CHI2005, Conference on Human Factors in Computing Systems
- 1998 Session Moderator, New Engineering Educators Conference, June 1998, Seattle, Washington.
- 1998 Co-organizer for ACM Computer Science Education Research Competition, February 1998, Atlanta, Georgia.

Conference Activities

- 1998 Reviewer, New Engineering Educators Conference
- 1998 Reviewer, American Society for Engineering Education National Conference
- 1997 Session Moderator for American Society for Engineering Education National Conference, June 1997, Milwaukee, Wisconsin.

| Advisory Boards | |
|-----------------|--|
| Current - 2012 | CLAK Impressions http://www.linkedin.com/company/clak-impressions |
| Current - 2010 | The Pennsylvania Technical Assistance Program (PennTAP),
http://penntap.psu.edu/action-council/ |
| Current - 2010 | Innoblue, http://innoblue.org/ |
| 2016 - 2007 | Global Academic Panel, Google Online Marketing Challenge,
http://www.google.com/onlinechallenge/discover/judging-panel.html |
| 2012 - 2010 | Chief Marketing Officer (CMO Council) Advisory Board for research initiative, Localize to Optimize Sales Channel Effectiveness |
| 2012 - 2010 | Jabbit Board of Advisors, http://www.jabbit.com/ |

Invited Talks (Selected)

Keynote

Keynote, 2016 Sixth National Doctoral Forum of Information Science, 7-18 July 2016, Tianjin, China.

http://jimjansen.blogspot.ga/2016/07/keynote-speaker-at-2016-sixth-national.html

Keynote

Keynote, The 7th International IEEE on Information and Communication Systems (ICICS 2016), 5-7 April, Irbid, Jordan.

Keynote

Keynote, The 10th International ACM Conference on Ubiquitous Information Management and Communication (IMCOM 2016), 4-6 January, Danang, Vietnam. http://jimjansen.blogspot.qa/2015/12/imcom-2016-keynote-transformed-role-of.html

Presentation, Sungkyunkwan University (Sowan Campus), 23 April 2015, Seoul, South Korea. http://jimjansen.blogspot.com/2015/04/visit-to-department-of-interaction.html

Presentation, National Research University Higher School of Economics, 10 March 2014, St. Petersburg, Russia

http://iimiansen.blogspot.com/2014/03/presentation-at-national-research.html

Invited Talks (Selected)

Presentation, Yandex, 11 March 2014, St. Petersburg Russia. http://jimjansen.blogspot.com/2014/03/visit-to-yandex-headquarters-in-st.html

Presentation, Sungkyunkwan University (Sowan Campus), 20-21 June 2013, Seoul, South Korea.

http://jimjansen.blogspot.com/2013/06/research-workshop-discussion-on-web.html

Presentation, Library and Information Science Department and College of Information and Media, Duksung Women's College, 19 June 2013, Seoul, South Korea. http://jimjansen.blogspot.com/2013/06/theoretical-constructs-of-searching-and.html

Presentation, Library and Information Science Department, College of Liberal Arts, Sungkyunkwan University, 18 June 2013, Seoul, South Korea. http://jimjansen.blogspot.com/2013/06/keyword-advertising-research.html

Presentation, Qatar Computer Research Institute, 24-29 April 2013, Doha, Qatar. http://jimjansen.blogspot.com/2013/04/research-presentation-to-folks-at-qatar.html

Presentation, Department of Decision Sciences, College of Business and Public Administration, Old Dominion University, 14-15 April 2013, Norfolk, VA. http://jimjansen.blogspot.com/2013/04/keyword-advertising-presentation-to.html

Presentation, Google Online Marketing Challenge Workshop, The University of Illinois at Urbana–Champaign, 11 March 2013. http://jimjansen.blogspot.com/2013/03/gomc-presentation-to-students-at.html

Keynote

Presentation, Casual Living Conference 2012, 22-24 February 2012, Sarasota, FL. http://accentsandfurnishings.com/conferences/casuallivingconference/2012/index.html

Keynote, The Direct Marketing Association of Washington (DMAW) Professor Institute. 3-4 January 2012, Washington. DC. http://www.dmawef.org/Professors Page/Professors Page.html

Presentation, Advance 2011: Rediscovering the Customer. 20-22 September 2011, San Diego, CA. http://www.idanalytics.com/advance2011/

Webinar, Web Analytics Webinar for the American Society for Information Science and Technology, 17 June 2011. http://asist.org/Conferences/webinars/2011/web-analytics.html

Keynote

Keynote, Buying and Selling eContent 2011. 28 March 2011, Scottsdale, AR. http://www.buy-sell-econtent.com/2011/Speakers/JimJansen.aspx

Presentation, Evri (semantic news aggregation company). 10 February 2011, Seattle, WA http://jimjansen.blogspot.com/2011/02/visit-to-evri-semantic-news-aggregation.html

Presentation, IMPAQT (search engine marketing agency). 10 November 2010, Pittsburgh, PA. http://jimjansen.blogspot.com/2010/11/visit-to-search-engine-marketing.html

Invited Talks (Selected)

Presentation, Yahoo! Research Lab. 9 November 2010, New York, New York. http://jimjansen.blogspot.com/2010/11/visit-to-yahoo-research-labs-new-york.html

Presentation, School of Communication and Information, Rutgers University. 8 November 2010, New Brunswick, NJ.

University-wide Presentation, Ryerson University, 18 October 2009, Toronto, Canada.

Presentation, Query Log Analysis: From Research to Best Practice 2009/ 27-28 May. London, UK. Funded by European Union project on Evaluation, Best Practices and Collaboration for Multilingual Information Access. http://ir.shef.ac.uk/cloughie/qlaw2009/index.html

Keynote

Presentation, Query Log Analysis: From Research to Best Practice 2009/ 27-28 May. London, UK. Funded by European Union project on Evaluation, Best Practices and Collaboration for Multilingual Information Access. http://ir.shef.ac.uk/cloughie/glaw2009/index.html

Presentation, Google. 30 October 2008. Mountain View, CA.

Presentation, IMPAQT (search engine marketing agency). 28 October 2008, Pittsburgh, PA. http://jimjansen.blogspot.com/2008/10/visit-to-sem-impaqt.html

Presentation, Mahalo (a human power search engine). 6 July 2008, Los Angeles, CA. http://jimjansen.blogspot.com/2008/07/mahalo-human-power-search-engine.html

Presentation, Pepperjam (search engine marketing agency). 24 June 2008, Wilkes-Barre, PA. http://jimjansen.blogspot.com/2008/06/visit-to-pepperjam.html

Presentation, School of Communication and Information, Rutgers University. 2 September 2005, New Brunswick, NJ.

Presentation, College of Information, University of North Texas, 15 June 1998. Denton, TX

Membership in Professional Societies

American Society for Information Science and Technology (ASIST)

Armed Forces Communications and Electronics Association (AFCEA)

Association for Computing Machinery (ACM)

The Institute of Electrical and Electronics Engineers (IEEE) Societies: Computer Society

Professional Experience

Numerous **consulting projects** and **expert witnessing** (class action suits, patent ligation, and civil ligation)

US Army Officer (2002 – 1985): Held various command and staff positions of progressively increasing responsibility. Responsible for vision articulation, planning, directing, and day-to-day management of organizations ranging in size from 10 to over 200 personnel. Served in numerous locations in the United States, Europe, Central America, and the Far East as a communication officer. Responsible for the planning and installation of various types of communication systems including radio, telephone, computer and other digital networks. Served with the 8 h U.S. Army Y2K Operational Evaluation Team validating critical information management systems. Responsible for the long term planning, developing, and budgeting of communication systems of all types for the U.S. Forces stationed on the Korean Peninsula. Responsible for a 22-person division that develops photographic, graphical, audio-visual and multimedia material for the U.S. Army War College.

Security Clearance

TS-SCI: Cleared for Top Secret information and granted access to Sensitive Compartmental Information based on a single scope background investigation by the Defense Security Service, Office of Personnel Management on 17 March 2011.

Appendix B Testimony Cases

| Year | Deliverables | Retained by | Case |
|------|--------------|-------------|---|
| 2016 | Testimony | Plaintiff | ERIN ANDREWS, Plaintiff, vs MARRIOTT |
| | Deposition | | INTERNATIONAL, INC., a Delaware |
| | | | Corporation; WESTEND HOTEL PARTNERS, |
| | | | LLC dba NASHVILLE MARRIOTT AT |
| | | | VANDERBILT UNIVERSITY, a Delaware |
| | | | Limited Liability Company, and MICHAEL |
| | | | DAVID BARRETT, an individual, Defendants. |
| | | | CASE NO. 11C4831, which is pending in the |
| | | | Circuit Court for Davidson County Tennessee at |
| | | | Nashville. |
| | | | Law Firm: Greene Broillet & Wheeler LLP |
| 2015 | Deposition | Plaintiff | ENCORE MEDIA METRICS, LLC fka SPUR |
| 2013 | Deposition | 1 Iamum | DIGITAL L.P., dba SPUR INTERACTIVE and |
| | | | STEVE LATHAM VS ADOMETRY, INC. fka |
| | | | CLICK FORENSICS, INC. Cause 2012-44351 / |
| | | | Court: 281. (The District Court of Travis County, |
| | | | Texas.) |
| | | | |
| | | | Law Firm: Watts & Guerra LLP and DiNovo Price |
| | | | Ellwanger & Hardy LLP |
| 2014 | Deposition | Defendant | M.B. AS NEXT FRIEND OF J.B., A MINOR |
| | _ | | Plaintiffs, V. CAMP STEWART FOR BOYS, |
| | | | INC., AMERICAN INSTITUTE FOR FOREIGN |
| | | | STUDY, INC. D/B/A CAMP AMERICA, AND |
| | | | SCOTT ASH JAMES ZIRUS Defendant. NO. |
| | | | 5:12-CV-1133 (Western District of Texas) |
| | | | Law Firm: Rymer, Moore, Jackson, & Echols PC |
| 2014 | Testimony, | Defendant | REAL LOCAL PAGE PARTNERS, LLC, |
| | Deposition | | Claimant, v. PAYMENT ALLIANCE |
| | | | INTERNATIONAL, INC., Respondent & |
| | | | PAYMENT ALLIANCE INTERNATIONAL, |
| | | | INC. Counter-Claimant, v. REAL LOCAL PAGE |
| | | | PARTNERS, LLC, Counter-Respondent. CASE |
| | | | NO. 32 147 Y 0021413. AMERICAN |
| | | | ARBITRATION ASSOCIATION, MIAMI, |
| | | | FLORIDA |
| | | | Law Firm: Kirkland & Ellis LLP |
| 2013 | Deposition | Plaintiff | CABLE WHOLESALE.COM, INC. v. SF |
| | T | | CABLE, INC. Case No. CV 11-2966 EMC |
| | | | (Northern District of California) |
| | | | Law Firm Law Offices of James C. Schwartz B.C. |
| | | | Law Firm: Law Offices of James G. Schwartz P.C. |

Appendix C Documents Referenced

Web Services

- Alexa www.alexa.com/
- Bing Search Engine https://www.bing.com/
- Compete https://www.compete.com/
- Google Keyword Tool https://adwords.google.com/KeywordPlanner
- Google Search Engine www.google.com/
- Google Trends https://www.google.com/trends/
- Microsoft Bing Keyword Tool www.bing.com/toolbox/keywords
- Million Short https://millionshort.com/
- SimiliarWeb www.similarweb.com/
- SpyFu www.spyfu.com/
- W3Snoop http://www.w3snoop.com/

Documents

- Agarwal, D., Chen, B. C., and Wang, X. *Multi-faceted ranking of news articles using post-read actions*. In Proc. of CIKM, ACM (2012), 694-703.
- Aikat, D. News on the web: usage trends of an on-line newspaper. Convergence: The International Journal of Research into New Media Technologies 4, 4 (Dec. 1998), 94-110
- BBC News https://en.wikipedia.org/wiki/BBC_News
- Castillo, C., El-Haddad, M., Pfeffer, J., & Stempeck, M. (2014, February). *Characterizing the life cycle of online news stories using social media reactions*. In Proceedings of the 17th ACM conference on Computer supported cooperative work & social computing (pp. 211-223). ACM.
- Complaint, VIRGINIA L. GIUFFRE, Plaintiff, v. GHISLAINE MAXWELL, Defendant. CASE NO. 1:15-cv-07433
- Daily Mirror https://en.wikipedia.org/wiki/Daily_Mirror
- GIUFFRE001120
- GM_00068 (Gow E-Mail)
- http://digitalmeasurement.nielsen.com/files/metrics-guidelines.pdf
- http://www.ebizmba.com/articles/news-websites
- http://www.mirror.co.uk/news/uk-news/prince-andrews-pal-ghislaine-maxwell-5081971
- http://www.nydailynews.com/news/world/alleged-madame-accused-supplying-prince-andrew-article-1.2065505
- http://www.pewresearch.org/fact-tank/2014/02/03/6-new-facts-about-facebook/
- https://www.google.com/advanced_search
- https://www.thesun.co.uk/archives/news/6754/prince-andrews-pal-ghislaine-groped-teen-girls/
- Mail Online https://en.wikipedia.org/wiki/Mail_Online
- Power Law https://en.wikipedia.org/wiki/Power_law
- Snowball sampling https://en.wikipedia.org/wiki/Snowball sampling

- Tatar, A., de Amorim, M. D., Fdida, S., & Antoniadis, P. (2014). A survey on predicting the popularity of web content. Journal of Internet Services and Applications, 5(1), 1.
- Teevan, J., Adar, E., Jones, R. and Potts, M. (2006). History repeats itself: repeat queries in Yahoo's logs. In *Proceedings of the 29th annual international ACM SIGIR conference on Research and development in information retrieval* (SIGIR '06). ACM, New York, NY, USA, 703-704.
- The Independent https://en.wikipedia.org/wiki/The_Independent
- The Times https://en.wikipedia.org/wiki/The_Times
- Triangulation (social science) http://en.wikipedia.org/wiki/Triangulation_%28social_science%29
- $\bullet \quad www.theguardian.com/media/2016/mar/17/independent-mirror-express-and-star-suffer-s \\ harp-fall-in-traffic$

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

| VIRGINIA L. GIUFFRE. | |
|----------------------|------------------|
| Plaintiff, | 15-cv-07433-RWS |
| v. | 13-CV-0/433-ICWS |
| GHISLAINE MAXWELL | |
| Defendants | |

EXPERT REPORT

OF

PETER KENT

OCTOBER 28TH, **2016**

- Slave, Virginia Roberts Lies, Virginia Giuffre Lies, Virginia Roberts Giuffre Lies, Virginia Roberts Untrue, Virginia Giuffre Untrue, Virginia Roberts Giuffre Untrue, Virginia Roberts Liar, Virginia Giuffre Liar, Virginia Roberts Giuffre Liar, Virginia Roberts Ross Gow, Virginia Giuffre Ross Gow, Virginia Roberts Giuffre Ross dishonest, Virginia Giuffre Ross dishonest, Virginia Roberts Giuffre dishonest, victims refuse silence sex slave
- 32. However, nowhere in his report does Mr. Anderson explain why these 26 search terms are important, beyond the fact that, he claims incorrectly, searching the major search engines with these phrases results in links to Web pages that contain allegedly defamatory material. However, this is true of literally thousands of different search phrases it's a simple task to create search terms to match particular pages but he never explains why these particular 26 phrases are relevant.
- 33. As I explain below in detail, Mr. Anderson's testimony is unreliable because it is *not* based on sufficient facts or data, nor is it the product of reliable principles and methods.

 Rather, it is seriously flawed in a number of ways.

1. Mr. Anderson's Choice of Search Terms Is Arbitrary

- 34. Mr. Anderson, in his report, provides a list of 26 search terms (Page 7) that appear to have been chosen in an arbitrary manner; furthermore, Mr. Anderson does not explain how these search terms are relevant to this case. Most of the examples are rarely if ever searched upon, and return few, if any, relevant results (that is, links to pages that discuss or recount Defendant's alleged defamatory statements).
- 35. Search terms are only relevant to this case if a searcher, wishing to find information about Plaintiff, would type the terms into a search engine. Mr. Anderson does not explain why such a person would type, for instance, the term *victims refuse silence sex slave*; in fact there seems no reason to believe that such a person would use this term. Why would someone wanting to research information about Plaintiff use the term *virginia roberts lies*, or *virginia roberts ross gow*? Mr. Anderson does not suggest any reason that somebody should use such terms. Indeed, these are terms unlikely to be used by anyone unfamiliar with this litigation or the fact that Defendant had denied Plaintiff's original allegations. These are not terms likely to be used by Mr. Anderson's "casual searcher" ("I conducted an investigation to determine the

106. However, this 3-step process (create pages, place them on Web sites, create links to the pages) is not very efficient, regardless of the fact that it is common in the ORM business. One should keep in mind that the primary goal of any business is maximizing profits, not efficiency. The 3-step process may be inefficient, but it has the advantage of increasing the income of ORM firms; rather than merely creating links, they can also charge for the creation and placement of Web pages. There is, however, an alternative strategy that some ORM firms in fact *do* use, as I describe later in this report.

2. The Problems With Mr. Anderson's Strategy

- 107. Mr. Anderson's strategy is unnecessarily expensive and complicated, for a number of reasons:
 - Mr. Anderson exaggerates the number of Web pages (780) that must be pushed down in the search results
 - Placing new Web pages on quality Web sites will be very difficult, and unnecessary
 - Pushing the new Web pages up in the search results will be very difficult

a) Mr. Anderson Exaggerates the Number of Web Pages (780) That Must Be Pushed Down In The Search Results

108. Mr. Anderson has stated that 780 Web pages must be pushed down in the search results; he takes his 26 search phrases, and multiplies by 30 results (in theory 10 results per search-result page, over three pages, in order to push the "offending" pages down to the fourth page, though in some cases, in particular on Google, there may actually be fewer results on the first page, perhaps 8 or 9.) This is wrong for various reasons.

Most of the Search Terms Will be Used Infrequently If Ever

109. As noted earlier, most of Mr. Anderson's 26 search terms are infrequently if ever employed by searchers. Why, for instance, would it be necessary to push down offending Web pages in the results that the search engines provide for the term *victims refuse silence sex slave*, when this term is likely never used (and furthermore, that the search results contain no Expert Report of Peter Kent Virginia L. Giuffre v. Ghislaine Maxwell

From: <ross@acuityreputation.com>

Date: 2 January 2015 at 20:38 Subject: Ghislaine Maxwell

To: Rossacuity Gow < ross@acuityreputation.com >

bcc: martin.robinson@mailonline.co.uk,

P.Peachey@independent.co.uk, nick.sommerlad@mirror.co.uk, david.brown@thetimes.co.uk,

nick.alway@bbc.co.uk, jo-anne.pugh@bbc.co.uk

To Whom It May Concern, Please find attached a quotable statement on behalf of Ms Maxwell.

No further communication will be provided by her on this matter.

Thanks for your understanding.

Best

Ross

Ross Gow ACUITY Reputation

Jane Doe 3 is Virginia Roberts - so not a new individual. The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue. The original allegations are not new and have been fully responded to and shown to be untrue.

Each time the story is re told it changes with new salacious details about public figures and world leaders and now it is alleged by Ms Roberts that Alan Derschowitz is involved in having sexual relations with her, which he denies.

Ms Roberts claims are obvious lies and should be treated as such and not publicised as news, as they are defamatory.

Ghislaine Maxwell's original response to the lies and defamatory claims remains the same. Maxwell strongly denies allegations of an unsavoury nature, which have appeared in the British press and elsewhere and reserves her right to seek redress at the repetition of such old defamatory claims.

Sent from my BlackBerry® wireless device

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May. 25. 2010 Cásを16-2868, Document 283, 08/09/2019, 2628241, Page499 6代883 「・ 2

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U.S. Department of Justice

United States Attorney Southern District of Florida

500 South Australian Ave., Suite 400 West Palm Beach, FL 33401 (561) 820-8711 Facsimile: (561) 820-8777

September 3, 2008

VIA COURIER

Ms. Virginia Roberts c/o Asst Legal Attache Matthew Witt United States Embassy Sydney Australia

Re: Jeffrey Epstein/Virginia Roberts: NOTIFICATION OF

IDENTIFIED VICTIM

Dear Ms. Roberts:

By virtue of this letter, the United States Attorney's Office for the Southern District of Florida provides you with the following notice because you are an identified victim of a federal offense.

On June 30, 2008, Jeffrey Epstein (hereinafter referred to as "Epstein) entered a plea of guilty to violations of Florida Statutes Sections 796.07 (felony solicitation of prostitution) and 796.03 (procurement of minors to engage in prostitution), in the 15th Judicial Circuit in and for Palm Beach County (Case Nos. 2006-cf-009454AXXXMB and 2008-cf-009381AXXXMB) and was sentenced to a term of twelve months' imprisonment to be followed by an additional six months' imprisonment, followed by twelve months of Community Control 1, with conditions of community confinement imposed by the Court.

In light of the entry of the guilty plea and sentence, the United States has agreed to defer federal prosecution in favor of this state plea and sentence, subject to certain conditions, including the following:

1. An independent Special Master was assigned the task of selecting an attorney representative to represent the victims, including you, in connection with civil actions between the victims and Mr. Epstein. The

Ms. Virginia Roberts Notification of Identified Victim September 3, 2008 Page 2 of 3

Special Master selected Robert Josefsberg, Esq. of the firm Podhurst Orseck, P.A., a highly-respected and experienced attorney. You are not obligated to use Mr. Josefsberg as your civil attorney, but, as explained in greater detail below, Mr. Josefsberg's services will be provided at no cost to you because Mr. Epstein is obligated to pay the costs and fees of the attorney-representative. Also, Mr. Epstein and his attorneys can only contact you via Mr. Josefsberg, assuming that you would like Mr. Josefsberg to serve as your attorney.

- 2. If you elect to file suit against Mr. Epstein pursuant to Title 18, United States Code, Section 2255, Mr. Epstein will not contest the jurisdiction of the United States District Court for the Southern District of Florida over his person and/or the subject matter, and Mr. Epstein waives his right to contest liability and also waives his right to contest damages up to an amount as agreed to between you and Mr. Epstein, so long as you elect to proceed exclusively under 18 U.S.C. § 2255, and you waive any other claim for damages, whether pursuant to state, federal, or common law. Notwithstanding this waiver, Epstein's agreement with the United States, his waivers and failure to contest liability and such damages in any suit are not to be construed as an admission of any criminal or civil liability.
- 3. As stated above, Mr. Epstein has agreed to pay the fees of the attorney representative selected by the independent third party. This provision, however, shall not obligate Epstein to pay the fees and costs of contested litigation filed against him. Thus, if after consideration of potential settlements, you and Mr. Josefsberg elect to file a contested lawsuit pursuant to 18 U.S.C. § 2255 or you elect to pursue any other contested remedy, the obligation to pay the costs of the attorney representative, as opposed to any statutory or other obligations to pay reasonable attorneys fees and costs such as those contained in Section 2255, shall cease.

Please contact either myself at ann.marie.c.villafana@usdoj.gov, or Justice Department Victim-Witness Specialist Twiler Smith at Twiler.Smith@ic.fbi.gov with a good telephone number and/or e-mail address, so that we may provide Mr. Josefsberg with a timely means of communicating with you. If you would like to contact Mr. Josefsberg

Ms. VIRGINIA ROBERTS NOTIFICATION OF IDENTIFIED VICTIM SEPTEMBER 3, 2008 PAGE 3 OF 3

directly, he can be reached at +1 305 358-2800.

If you have already selected other counsel to represent you, or if you do so in the future, and you decide to file a claim against Jeffrey Epstein, Mr. Epstein's attorney, Jack Goldberger, asks that you have your attorney contact Mr. Goldberger at Atterbury Goldberger and Weiss, 250 Australian Avenue South, Suite 1400, West Palm Beach, FL 33401, (561) 659-8300.

In addition, there has been litigation between the United States and two other victims regarding the disclosure of the entire agreement between the United States and Mr. Epstein. Mr. Josefsberg can provide further guidance on this issue, or if you select another attorney to represent you, that attorney can review the Court's order in the matter of Inre Jane Does 1 and 2, United States District Court for the Southern District of Florida Court File No. 08-80736-CIV-MARRA.

Please understand that neither the U.S. Attorney's Office nor the Federal Bureau of Investigation can take part in or otherwise assist in civil litigation. Thank you for all of your assistance during the course of the federal and state investigations and please accept the heartfelt regards of myself and Special Agents Kuyrkendall, Slater, and Richards for your health and well-being.

Sincerely,

R. Alexander Acosta United States Attorney

By:

A. Marie Villafaña

Assistant United States Attorney

Robert Josefsberg, Esq. cc:

Jack Goldberger, Esq.

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07/05/2013 Date of entry

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| New South Wales, Australia, 2261 was | | |
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| | and via telephone, Assistant | |
| United States Attorney | GIUFFRE provided the | |
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| Beach County, Florida with her parent | _ | |
| returned to California at age 11. Sh | | |
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| Florida. | | |
| approximately 14 years old, and while Florida, she met | e living on the streets in Miami, | |
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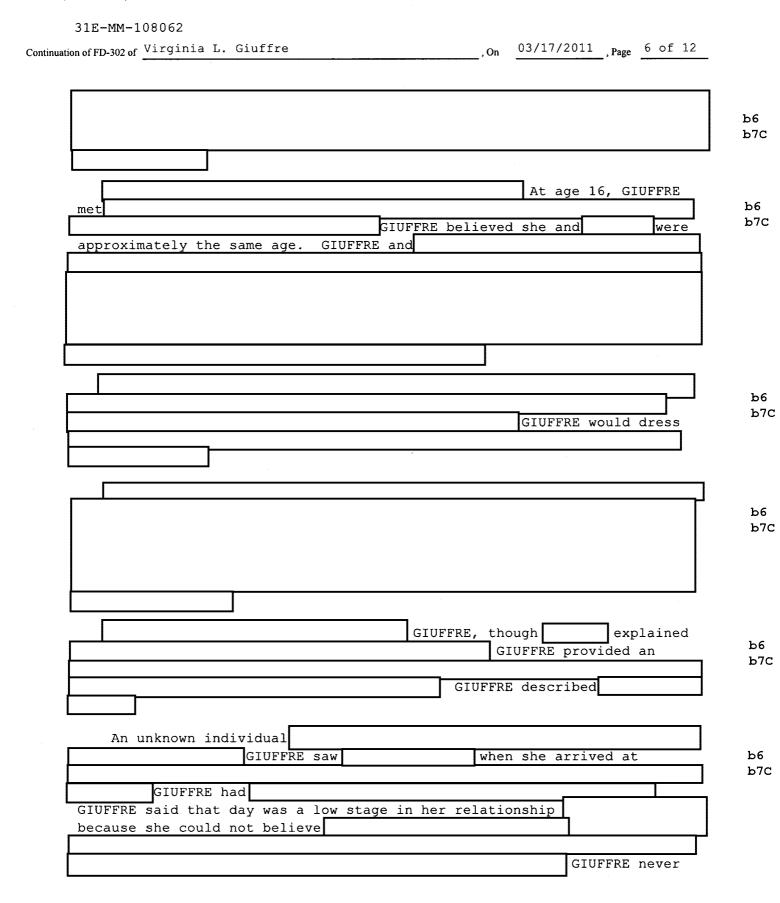
This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency, it and its contents are not to be distributed outside your agency.

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| fall that | she was sent to | | but did not know | GIUFFRE |
| | s of the arrangement. G | THEFRE engaged in | - | |
| - Specification | who was described a | | | E stated |
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| n of FD-302 of Virginia I | L. Giuffre | , On | 03/17/2011, Pa | ge 3 of 12 |
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| | Florida. sp | oke with CIUFF | RE's father an | d told him |
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31E-MM-108062 Continuation of FD-302 of Virginia L. Giuffre 03/17/2011 _{Page} 4 of 12 . On The same routine and pattern of massages and sexual activity between and GIUFFRE continued for between one and two weeks. At **b6** b7C times, offered GIUFFRE the option to quit her job at Mar-A-Lago and travel was also discussion of GIUFFRE receiving massage training. GIUFFRE was to be paid \$200.00 per day for travel and \$200.00 per hour for massages. Early in her relationship with GIUFFRE met b6 b7C and was introduced as assistant. GIUFFRE soon began traveling For the initial six months, GIUFFRE traveled around the United States and Caribbean, b6 including California, New York City, New Mexico, and various business b7C trips. During those trips, Six to nine months after GIUFFRE began working for GIUFFRE was introduced to LNU. **b6** in b7C Florida. at the time. GIUFFRE met the couple at a condominium next to the The condominium was bought and was a In the condominium, GIUFFRE provided a normal massage to LNU. Shortly thereafter, LNU GIUFFRE provided an erotic massage to GIUFFRE and GIUFFRE cleaned She was paid cash In addition, paid GIUFFRE GIUFFRE was 16 years old at the time GIUFFRE advised introduced her to the drug Xanax. She explained that Xanax helped her escape from reality but allowed her to **b6** b7C still function normally. Xanax helped her go forward with what she was doing with and others. Her habit went from two pills per day up to eight pills per day. GIUFFRE's second client was an academic of some sort described as an older American male sent GIUFFRE from Miami International Airport to **b6** b7C by commercial airline. GIUFFRE was picked up at the airport by and then taken to the island by boat. GIUFFRE

| pointed out that | |
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| | instructed GIUFFRE to entertain the |
| client | and wanted |
| to ride jet skis and participat | |
| with the client. GIUFFRE assum | GIUFFRE spent two days on the island |
| commercially. | les the circut also travered |
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| | al months, GIUFFRE traveled internationally |
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| | got passport photographs of herself and |
| provided them to The r | cemaining paperwork was taken care of by |
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| times, GIUFFRE would | |
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| | contacted GIUFFRE through |
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| and wa | anted to talk to GIUFFRE about |
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| offered GIUFFRE a contract. GI | UFFRE agreed to the contract for her story |
| | story, \$10,000 when the article was printed, |
| and another \$10,000 to be wired | d into GIUFFRE's account in May 2011. The |
| contract prevented GIUFFRE from | n talking to any other press for a specified |
| period. GIUFFRE advised that s | she provided with detailed |
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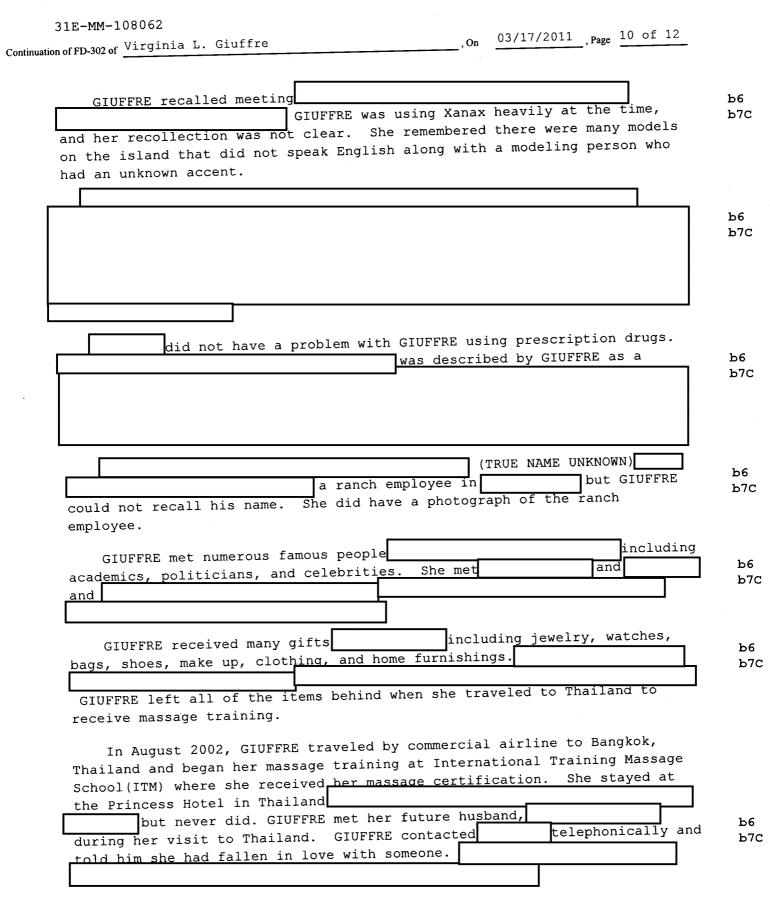
31E-MM-108062 Continuation of FD-302 of Virginia L. Giuffre 03/17/2011 _{Page} 8 of 12 , On LNU and GIUFFRE went shopping together and purchased clothing and sex toys. GIUFFRE explained that b6 b7C b6 b7C GIUFFRE used a cellular telephone She believed it was GIUFFRE and a New York City number but could not recall the number. GIUFFRE could only remember faces not their names. GIUFFRE did not but she did try unsuccessfully to get GIUFFRE recalled but she could b6 not recall the wording. LNU. b7C GIUFFRE advised GIUFFRE traveled to a self-help conference at a hotel in b6 New Orleans, Louisiana. The hotel was near the Hard Rock Café in New b7C Orleans. GIUFFRE traveled the world including the USVI, New York, Santa Fe, Palm Beach, France, Africa, Spain and the United Kingdom. b6 GIUFFRE recalled visiting b7C Alhambra Castle in Spain. GIUFFRE eventually traveled to the United Kingdom and

| 31E-MM-108062 | |
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| Continuation of FD-302 of Virginia L. Giuffre ,On | 03/17/2011 _{Page} 9 of 12 |
| | |
| while there approached GIUFFRE in a very e her they had to go shopping to pick out a dress bec dancing with | |
| | |
| GIUFFRE and went shopping and purchased Burberry bag. The items were purchased with | makeup, clothing, and a GIUFFRE |
| and returned instructed GIUFFRE to get ready. When GIUFFRE came | down after getting |
| ready, she was introduced to | |
| | |
| | |
| GIUFFRE traveled to CLUB TRAMP | GIUFFRE |
| danced at CLUB TRAMP | |
| | |
| | stayed at CLUB TRAMP |
| | f cocktails before
received any direction |
| from | lozuppp |
| requested to take a photograph of her advised that she still had the original photograph | |
| would provide it to the interviewing agents. GIUFF | RE proceeded with |
| | |
| Approximately two months later, GIUFFRE met | at |
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| GIUFFRE recal | led |
| LNU, | |
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| GIUFFRE recalled joking about tradis | ng GIUFFRE in because |

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FD-302a (Rev. 05-08-10)

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| on of FD-302 of Virginia L. Giuffre | on 03/17/2011, Page 11 of 12 |
| | |
| GIUFFRE had not heard from | |
| | GIUFFRE received a |
| · L | that call, stated he was an |
| FBI agent. He was trying to determine w | |
| | ything about her knowledge of |
| | d another telephone call from a |
| person that indicated he was an FBI ager | |
| individual anything either. She also rec
was trying to determine if she had spoke | |
| speak to anyone | en with anyone or was willing to |
| speak to anyone | She |
| explained that she was receiving telepho | one calls from people whom she did |
| not know and that she was uncomfortable | |
| telephone. | |
| | |
| One or two weeks later, an unknown a | attorney and contacted |
| GIUFFRE telephonically. | |
| | |
| carrier was OPTUS telephone company. GIUFFRE reviewed a series of photographe following: | raphs of individuals and identified |
| Page 1, number 1, | |
| Page 1, number 2, LNU, a.k.a. | |
| Page 2, number 1, | ·
 |
| Page 2, number 6, | |
| Page 3, number 2, | |
| Page 4, number 3, LNU | |
| Page 4, number 7, | |
| Page 4, number 8, | |
| Page 5, number 1, | |
| GIUFFRE advised that the following were | |

recall their names or her association to them:

GIUFFRE001245

FD-302a (Rev. 05-08-10)

| 31E-MM-1 | 08062 | | | | |
|---------------------------|---|--------|---------------|-----------|----------|
| Continuation of FD-302 of | Virginia L. Giuffre | _ , On | 03/17/2011 | , Page | 12 of 12 |
| | | | | | |
| Page 1, | number 4 | | | | |
| Page 2, | numbers 7 and 8 | | | | |
| Page 3, | number 8 | | | | |
| Page 4, | number 1 | | | | |
| Page 5, | numbers 5 and 8 | | | | |
| The file. | images reviewed by GIUFFRE were placed i | in a | 1A envelope | e of | the case |
| records | of her entries into the United States Customs
2001 record was the return from her Lond | GIUFE | FRE advised | that
p | her |
| record v | was her return to the United States | | ine npili | .001 | |
| | GIUFFRE could not | rec | all her tra | vel | from |
| March a | nd May 2001 CPB records. GIUFFRE advised | | | | |
| Passport | t was turned over to the United States Co | onsul | ate in Sydr | ey, | |
| Austral: | ia. | | | | |
| | March 18, 2011, writer, SA and and | م ما د | 20 what agree | ha a | |
| | d to GIUFFRE's residence where she provide sage school certification. FD-597 Receipt | | | | |
| | d for the items and a copy was provided t | | | | |
| | eipts were dated based on the United Stat | | | | |
| | te. The photographs, certification and or | | | | |

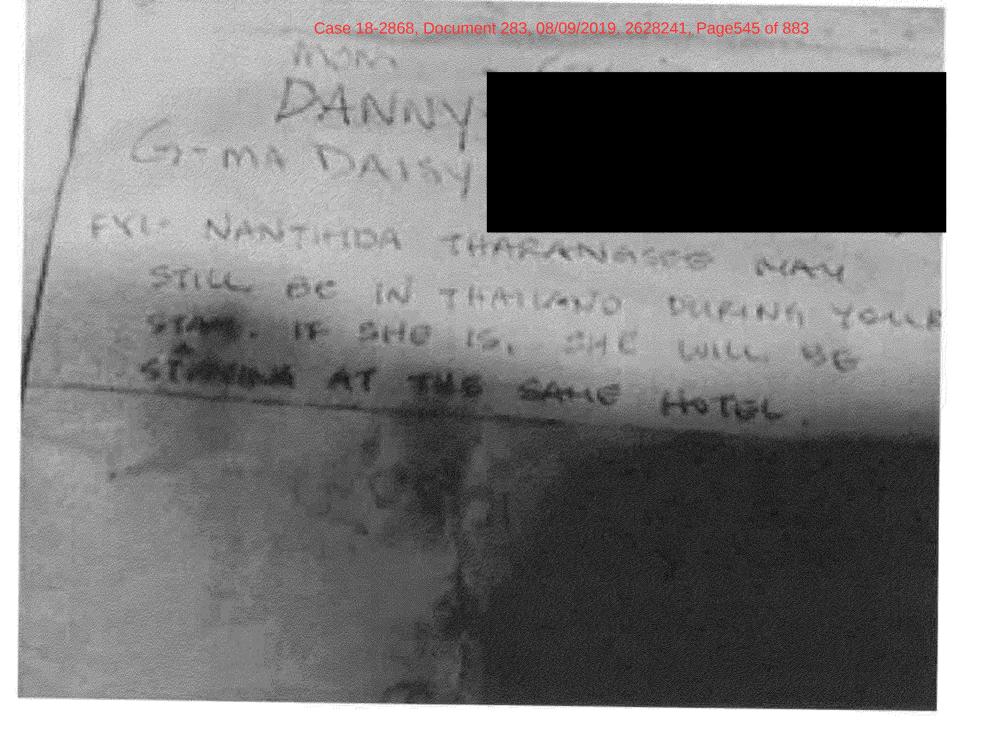
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Case 18-2868, Document 283, 08/09/2019, 2628241, Page544 of 883 HS MAKUKUL VIRGINIA ROBERTS



| Case 18-2868, Document 283, 08/09/2019, 2628241, Page546 of 883 |
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Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.

December 30, 2014

New York Presbyterian Hospital Weill Cornwell Medical Center Medical Records 525 East 68 Street New York, NY 10065

RE: Request for MEDICAL RECORDS and BILLING

Our Client/Your Patient :

Virginia Rone

Date of Birth :

January 1, 1998 - December 31, 2000

Dates Requested Our File Number

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To Whom It May Concern:

This is a follow up to our original December 1, 2014 request for medical records (a copy of same is attached for your convenience). Attached, please find a copy of the Refused/Returned Notice for your convenience. Pursuant to same, please be advised that we would like ALL records from August 9, 1983—present. If that is too general/broad, please limit the search to January 1, 1998 to December 31, 2000.

Please contact us if the reproduction costs exceed \$50.00.

Please contact us if you have any questions or wish to discuss this matter further. We look forward to your prompt compliance with this request.

Very truly yours,

FARMER, JAFFE, WEISSING, EDWARDS, FISTOS & LEHRMAN, P.L.

Amy W. Dishowitz, Paralegal For Bradley J. Edwards, Esq.

BJE: awd Enclosures

DECENVED A JAN 0 6 2015

BY:

425 North Andrews Avenue, Suite 2, Fort Lauderdale, Florida 33301 954.524.2820 office 954.524.2822 fax





Farmer, Jarfe, Weissing, Edwards, Fistos & Lehrman, P.L.

December 30, 2014

New York Presbyterian Hospital Weill Cornwell Medical Center Medical Records 525 East 68 Street New York, NY 10065

Request for MEDICAL RECORDS and BILLING Virginia Robert Our Client/Your Patient

Date of Birth

Dates Requested Our File Number January 1, 1998 – December 31, 2000 /

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Amy W. Dishowitz, Paralogal For Bradley J. Edwards, Esq.

BJE: awd Enclosures

BY: ------

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| SAN WILL per note indicated R pelac U.S. CT also done - negorated "variable" It has no calining SIS on exam & CMT. Likely Las cerniatis \$ 2/0 Apprece & Prophylactic Par fore |
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| Agree & PROP INFOCTOR PAR |
| PARCE & PROPOLYPOCE PX FOR |
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| (M. bels) |
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| |

525 East 68th Street, New York, N.Y.10021 M. Desmond Burks, M.D., Laboratory Director

Patient Name: ROBERTS, VIRGINIA L.

CLIENT INFORMATION: EMOND, SIEPHEN D MD 525 East 68th Street New York

NY 100210000

Client#: 00000 NEW YORK HOSPITAL

| oll Date: | 07/09/2001
1911 | Recyd Date:
Recyd Time: | 07/09/2001
1911
FINAL | Rpt Date: 07/1
Rpt Time: 0438 | 0/2001 |
|---------------|--------------------|----------------------------|-----------------------------|----------------------------------|------------|
| EST NAME | | ABNORMAL | NORMAL | REFERENCE | UNITS |
| COM | PLETE BLOOD COU | NT | | | |
| WBC | | | _8.2 | 3.4-11.2 | K/uL |
| RBC | | | 4.23 | 3.80-5.20 | M/uL |
| HGB | | | 13.2 | 11.7-16.0 | g/dL |
| HCT | | | _38,2 | 35.0-47.0 | <u>\$</u> |
| MCV | | | 90.3 | 81.0-100.0 | fL |
| MCH | | | 31.2 | 27.0-34.0 | bà |
| MCHC | | | 34.6 | 32.0-36.0 | g/dL |
| RDW | | | 12.6 | 11.0-14.0 | _% |
| PLATELET | MA | | 272.0 | 150.0-450.0 | K/uL |
| MPV | | | 10.4 | 8.0-12.0 | _fL |
| | | | | | |
| NEUT % | OMATED DIFFERENT | NIAL
83.4 H | | 45.0-75 <u>.0</u> | <u>P</u> |
| LYMPH % | | 8.1 <u>L</u> | | 20.0-50.0 | * |
| MONO \$ | | | 7.6 | 2.0-11.0 | 0.00 |
| EOS % | | | _0,5 | 0.0-5.0 | -8 |
| EASO % | | | 0.4 | 0.0-1.0 | 9 8 |
| NEUT ABS | | 6.8 H | | 2.1-4.9 | K/uL |
| LYMPH ABS | 3_ | 0.7 L | | 1.4-2.9 | K/uL |
| MONO ABS | | | 0.8 | 0.2-0.9 | K/uL |
| EOS ABS | | | 0.0 | 0.0-0 3 | K/uL |
| BASO ABS | | | 0.0 | 0.0-0 1 | K/uL |
| ed by DIN9011 | | | Page 1 | | 01-06-2015 |

L=LoW, H=HIGH

OUTPATIENT REPORT

Page: 1 CONTINUED



Page 2

Case 18-2868, Document 283, 08/09/2019, 2628241, Page558 of 883

DocType: LAB REPORTS

M. Desmond Burke, M.D., Laboratory Director

Patient Name: ROBERIS, VIRGINIA L.

CLIENT INFORMATION: EMOND, STEPHEN D MD 523 East 68th Street New York

NY 100220000

Client#: 00000 NEW YORK HOSPITAL

Coll Date: 07/09/2001

Coll Time: 1911

Recyd Time:

1911 FINAL

Recvd Date: 07/09/2001 Rpt Date: 07/10/2001

Rpt Time: 0438

ABNORMAL

NORMAL

REFERENCE UNITS

RODTINE CHEMISTRY

AMYLASE

TEST NAME

46

15-127

D/L

Page: 2 CONTINUED

OUTPATIENT REPORT



Page 3

Patient Name at ROBERTS, VIRGINIA L.

Med Rec #: Date of Birth:

100210000 Req#||

Sex: F

CLIENT INFORMATION:

EMOND, STEPHEN D MD 525 East 68th Street

New York

NY

Client#: 00000

NEW YORK HOSPITAL

Coll Date: 07/09/2001

07/10/2001

Record Date: 07/09/2001

Rpt Date:

Recvd Time: 1911 FINAL

Rpt Time: 0438

CANCELLED TESTS

PROCEDURE

Coll Time: 1911

DRAWN DATE

REASON

BASIC METABOL FANEL Order Entry Error

07/09/01

Page: END OF CHART



Page 4

525 East 68th Street, New York, N.Y. 10021 M. Desmond Burke, M.D., Laboratory Director

Patient Name: ROBERTS, VIRGINIA

CLIENT INFORMATION: EMOND, STEPHEN D MD 525 East 68th Street

New York

NY 100210000

00000 Client#:

NEW YORK HOSPITAL

Coll Date: Coll Time:

Req#i

07/09/2001 1855

Recvd Date: Recvd Time:

07/09/2001 1913

07/10/2001 Rpt Date: Rpt Time:

0438

TEST NAME

ABNORMAL

30*

IRACE*

NORMAL

FINAL

REFERENCE

UNITS

MACROSCOPIC URINALYSIS

COLOR

APPEARANCE PROTEIN

BLOOD

GLUCOSE

KE TONES

pН BILIRUBIN

SP GRAVITY

NITRATE LEUKOCYTE ESTER

MICROSCOPIC URINALYSIS NOTE

RBC/HFF

WBC/HPF RENAL EPITH

NOTE (09/08/2000 -- Current)

YELLOW DK AETPO

> CLEAR CLEAR

NEGATIVE

NEGATIVE NEGATIVE

NEGATIVE NEGATIVE

NEGATIVE

4.8-8.0 7.0

NEGATIVE NEGATIVE 1.025 1.005-1.030

NEGATIVE NEGATIVE

NEGATIVE NEGATIVE

SEE NOTE:

0 - 2

0-2

0 - 2

0 - 2

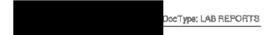
NEGATIVE NEGATIVE

THIS URINE HAS BEEN EXAMINED FOR WBC, RBC, CASTS, CRYSTALS AND

EPITHELIAL CELLS. ANY OF THESE ELEMENTS NOT REPORTED WAS NOT FOUND.

ed by DIN9011

Page 5



*=ABNORMAL, f=FCCTNOTE

Page: 1 END OF CHART



Page 5

525 East 68th Street, New York, N.Y.10021 M. Desmond Burke, M.D., Laboratory Director

Patient Name: ROBERTS, VIRGINTA L.

CLIENT INFORMATION: EMOND, STEPHEN D MD 525 East 68th Street New York

Client#: 00000

NY 100210000

NEW YORK HOSPITAL

 Coll Date:
 07/09/2001
 Recvd Date:
 07/09/2001
 Rpt Date:
 07/10/2001

 Coll Time:
 1915
 Recvd Time:
 1925
 Rpt Time:
 0438

| TEST NAME | ABNO | RMAL | NORMAL | REFERENCE | UNITS |
|----------------------------|------|----------|--------------|----------------|--------|
| ROUTINE CHEMISTRY | 115 | H | | <u>70</u> –105 | mg/dl |
| UREA NITROGEN | | | 8 | 5-25 | mg/dL |
| CREATININE | | | 0,8 | 0.5-1.5 | mg/dL |
| SODIUM | | | 138 | 133-347 | mmol/L |
| FOTASSIUM | | | 3.6 | 3.2-5.2 | mmol/L |
| CHLORIDS | | | 103 | 94-110 | mmol/L |
| <u></u> | 21 | L | | 22-32 | mmo1/L |
| ANION GAP | | | 14 | 05-17 | |
| URIC ACID | | | 3.2 | 2.5-7.5 | mg/dL |
| CALCIUM | | | 9.0 | 8.5-10.5 | mg/dL |
| PHOSPHORUS | | | 3.4 | 2.2-4.2 | mg/dL |
| PROTEIN, TOTAL | | | 7.7 | 5,5-8 0 | g/dL |
| ALBUMIN | | | 4 2 | 3.0-5.0 | g/dL |
| GLOBULIN | 3.4 | <u>H</u> | | 1.8-3.3 | g/dL |
| BILIRUBIN TOT | | | 0.7 | 0.2-1.3 | mg/dL |
| BILIRUBIN DIR | | | 0.2 | 0.1-0.4 | mg/dL |
| BILIRDEIN IND | | | 0.5 | 0.1-0.8 | mg/dL |
| _CROLESTEROL | | | 130 <u>f</u> | _≤ 200 | mg/dl |
| MAGNESIUM | | | 1.6 | 1.5-1.9 | mEq/L |
| TZA | | | 30 | 0-45 | U/L |
| ALI | | | 13 | 0-45 | U/L |
| THOLEGEPON /03/13/1899 Com | | | | | |

CHOLESTEROL (03/17/1999 - Current)

ed by DIN9011

011

Page 7

DESIRABLE: <200 mg/dL

BORDERLINE HIGH: 200-239 mg/dL

HIGH: >=240 mg/dL

L=LOW, H=HIGH, f=FOOTNOTE

Page: 1
CONTINUED

OUTPATIENT REPORT



Page 8

M. Desmond Burke, M.D., Laboratory Director

Patient Name: ROBERTS, VIRGINIA L.

CLIENT INFORMATION: EMOND, STEPHEN D MD 525 East 68th Street New York

NY 100210000

Client#: 00000 NEW YORK HOSPITAL

| Coll Date: 07/09/2001
Coll Time: 1915 | Recvd Date:
Recvd Time: | 07/09/2001
1925
<u>FI</u> NAL | Rpt Date: 07/10
Rpt Time: 0438 | /2001 |
|--|----------------------------|-------------------------------------|-----------------------------------|-------|
| TEST NAME | _ABNORMAL | NORMAL | REFERENCE | UNITS |
| ROUTINE CHEMISTRY LD ALKALINE PHOS | | <u>183</u> | 80-225
<u>30-110</u> | 5/L |
| <u>CORONARY</u> RISK
<u>CHOLESTEROL</u> | | 3.30 | <u> < 30</u> 0 | mg/dL |

DESIRABLE:

<200 mg/dl

BORDERLINE HIGH: 200-239 mg/dL

HIGH:

>=240 mg/dL



Page 9

DOCType: LAB REPORTS

Page: 2 END OF CHART



Page 10

525 East 68th Street, New York, N.Y.10021 M. Desmond Burke, M.D., Laboratory Director

Patient Name: ROBERTS, VIRGINIA L.

CLIENT INFORMATION: EMOND, STEPHEN D MD 525 East 68th Street

New York

NY 100210000

Reg#:

Client#: 00000 NEW YORK HOSPITAL

Coll Date: 07/09/2001 Record Date: 07/09/2001 Coll Time: 1934

Recvd Time: 1934
FINAL

Rpt Date: 07/10/2001 Rpt Time: 0438

TEST NAME

ABNORMAL

NORMAL

REFERENCE UNITS

SENDOUT CULTURES

BLOOD GROUP AND TYPE

PROCEDURE: ABO RH

07/09/2001 1934

A PCS

ANTIBODY SCREEN AND WORKUP

FROCEDURE: ABSC INT

07/09/2001 1934 NOTIMMED



Page 11

Page: 1 END OF CHART



Page 12

525 East 68th Street, New York, N.Y.10021 M. Desmond Burke, M.D., Laboratory Director

Patient Name: ROBERIS, VIRGINIA L.

CLIENT INFORMATION: EMOND, STEPHEN D MD 525 East 68th Street

New York

NY 100210000

Client#: 00000

NEW YORK HOSPITAL

Coll Date: 07/09/2001 Coll Time: 0941

Recvd Date: 07/10/2001 Recvd Time: 0941 FINAL

Rpt Date: _07/11/2001

Rot Time: 0452

TEST NAME

ABNORMAL

NORMAL

REFERENCE UNITS

GC-CHLAMYDIA

CHLAMYDIA-GC BY AMPLIFICATION

CHLA SWAB SOURC

CERVIX

CHLA SWAB

NEGATIVE

NEGATIVE

GC SWAB SOURCE

CERVIX

GC SWAB

NEGATIVE

NEGATIVE

Page: END OF CHART



Page 13

525 Bast 68th Street, New York, N.Y.10021 M. Desmond Burke, M.D., Laboratory Director

Patient Name: ROBERTS, VIRGINIA L.

CLIENT INFORMATION: EMOND, STEPHEN D MD 525 East 68th Street

New York

MY 100210000

Client#: 00000

NEW YORK HOSPITAL

07/09/2001 Coll Date: Coll Time:

1929

Recyd Date: Recyd Time:

07/10/2001 0941

07/11/2001 Rpt Date:

Rpt Time: 0452

PARTIAL

TEST NAME

ABNORMAL

NORMAL

REFERENCE UNITS

GENITAL: CULTURE-SCREEN

ACCESSION

GENITAL CULTURE

SOURCE: CERVIX FREETEXT SOURCE:

COLLECTED: 07/09/01 1929

RECEIVED: 07/10/01 0941 STARTED: 07/10/01 0941

01-ME-01-045532

STAINS & PREPS ---

07/10/2001 1342

MANY GRAM POSITIVE BACILLI CONSISTENT WITH LACTOBACILLI

MODERATE EPITHELIAL CELLS

MODERATE WEC SEEN

Page: END OF CHART

ad by DIN9011

Page 14

525 East 68th Street, New York, N.Y.10021 M. Desmond Burke, M.D., Laboratory Director

ROBERTS, VIRGINIA

CLIENT INFORMATION: EMOND, STEPHEN D MD 525 East 68th Street

New York

NY 100210000

Client#: __00000

NEW YORK HOSPITAL

07/09/2001 Coll Date: Coll Time:

Recyd Date: Recvd Time: 0941

07/10/2001

Rpt Date: 07/12/2001

Rpt Time:

TEST NAME

ABNORMAL

NORMAL

PARTIAL

REFERENCE UNITS

GENITAL: CULTURE-SCREEN

GENITAL CULTURE SOURCE: CERVIX FREETEXT SOURCE: COLLECTED: 07/09/01 1929

RECEIVED: 07/10/01 0941

07/10/01 0941 STARTED:

01-MB-01-045532 ACCESSION:

STAINS & PREPS

07/10/2001 1342

MANY GRAM POSITIVE BACILLI CONSISTENT WITH LACTOBACILLI

MODERATE EPITHELIAL CELLS

MODERATE WEC SEEN

--- PRELIMINARY REPORT

07/11/2001 1037

MODERATE GRAM POSITIVE BACILLI CONSISTENT WITH

LACTOBACILLI

CULTURE BEING RELD FOR FURTHER EVALUATION

ed by DIN9011

Page 15

Page: 1 END OF CHART



Page 16

525 East 68th Street, New York, N.Y.10021 M. Desmond Burke, M.D., Laboratory Director

> CLIENT INFORMATION: EMOND, STEPHEN D MD 525 East 68th Street New York

NY 100210000

Client#: 00000

NEW YORK HOSPITAL

Coll Date: 07/09/2001 Coll Time: 1655

Recvd Date: Recyd Time:

07/10/2001 1102

Rpt Date: 07/12/2001

Rpt Time: 0532

TEST NAME

_ABNORMAL

NORMAL

FINAL

REFERENCE _UNITS

URINE CULTURE

URINE CULTURE

SOURCE: URINE CLEAN CATCH

FREETEXT SOURCE:

COLLECTED: 07/09/01 1855

01-MB-01-045573

RECEIVED: 07/10/01 1102 STARTED: 07/10/01 1102

___ FINAL REPORT -

ACCESSION#:

_07/11/2001 _1323

NO GROWTH (<1,000 CFU/ML)

Page: 1 END OF CHART



Page 17

525 East 68th Street, New York, N.Y.10021 M. Desmond Burke, M.D., Laboratory Director

Patient Name: ROBERTS, VIRGINIA L.

CLIENT INFORMATION: EMOND, STEPREN D MD 525 East 68th Street

New York

NY 100210000

Client#: 00000

NEW YORK HOSPITAL

07/09/2001 Coll Date: Coll Time:

07/10/2001 Recvd Date: Recvd Time:

07/13/2001 Rpt Date:

0541 Rpt Time:

TEST NAME

ABNORMAL

NORMAL

PARTIAL

REFERENCE UNITS

GENITAL: CULTURE- SCREEN

GENITAL CULTURE SOURCE: CERVIX FREETEXT SOURCE:

COLLECTED: 07/09/01 1929 RECEIVED: 07/10/01 0941 STARTED: 07/10/01 0941

ACCESSION#: 01-MB-01-045532

STAINS & PREFS

07/10/2001 1343

MANY GRAM POSITIVE BACILLI CONSISTENT WITH LACTOBACILLI

MODERATE EPITHELIAL CELLS

MODERATE WEC SEEN

PRELIMINARY REPORT

07/11/2001 1037

MODERATE GRAM POSITIVE BACILLI CONSISTENT WITH

LACTOBACILLI

COLTURE BEING HELD FOR FURTHER EVALUATION

07/12/2001 1130

MODERATE GRAM POSITIVE BACILLI CONSISTENT WITH

LACTOBACILLI

CULTURE BEING HELD FOR FURTHER EVALUATION

ed by DIN9011

Page 18

Page: <u>1</u> END OF CEART



Page 19

525 East 68th Street, New York, N.Y.10021 M. Desmond Burke, M.D., Laboratory Director

Patient Name:

ROBERTS, VIRGINIA L.

CLIENT INFORMATION: EMOND, STEPHEN D MD 525 East 68th Street

FINAL

NY 100210000

New York Client#:

00000

NEW YORK HOSPITAL

Coll Date: 07/09/2001 Coll Time: 1929

Recyd Date: Recyd Time:

07/10/2001 0941

Rpt Date: 07/14/2001

Rpt Time:

0431

TEST NAME

ABNORMAL

NORMAL

REFERENCE UNITS

GENITAL: CULTURE-SCREEN

GENITAL CULTURE SOURCE: CERVIX FREETEXT SOURCE:

COLLECTED: 07/09/01 1929 RECEIVED: 07/10/01 0941 STARTED: 07/10/02 0941

ACCESSION# 01-MB-01-045532

--- STAINS & PREPS

07/10/2001 1342

MANY GRAM POSITIVE BACILLI CONSISTENT WITH LACTOBACILLI

MODERATE EPITHELIAL CELLS

MODERATE WEC SEEN

--- PRELIMINARY REPORT

07/11/2001 1037

MODERATE GRAM POSITIVE BACILLI CONSISTENT WITH

LACTOBACILLI

CULTURE BEING HELD FOR FURTHER EVALUATION

07/12/2001 1130

MCDERATE GRAM POSITIVE BACILLI CONSISTENT WITH

<u>LACTOBACI</u>LLI

CULTURE BEING HELD FOR FURTHER EVALUATION

FINAL REPORT

07/13/2001 1117

MODERATE GRAM POSITIVE BACILLI CONSISTENT WITH

ed by DINS011

LACTOBACILLI

NO NEISSERIA GONORRHEAE ISOLATED

Page: 1 END OF CHART



Page 21

| | | DocType: | ORDERS | ; | | | | | | |
|-----|--------------------------------------|---|----------------|--|------------------|-----------------------|---|-----------------|---------------|-------------|
| | | ORK-PRESBY | | | | ** | | | <u>:</u>
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| | | 4517 | | | | | OPERTS. | VIR | GIRI | <u>n</u> - |
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| | (2) Unit Clerk: | Fac this form to appropria | te tast árde þ | © and oumplets | Libe folloving: | PRODRITY HATING | * EMENCHALLA MICHIL | t Voice | HOUSE S | PLI) |
| | i i | TI Tested To | TR9 | _ Clerk Inklais | ; | RADIOLOGY | PRIORITY 1, 2 or | 3 FAX | | DONE |
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medical record. | for posting | order on unit a | nd place form i | □ CNR | | -28093 | | _ |
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| | | Freuenist N. 2013 | FAA | DATE | TEME | ☐ Portable , | | 28033 | | |
| | ☐ Echo ☐ PGRT | - | .68701 | 1 | | FLUCROSCOPY | | | | |
| 9 | ☐ EKG ☐ PORT
☐ Signal Average EKG | | 88701 | ļ | | D Be E P | | 28093 | | |
| | Holler Monitor | 1 | 68701 | 1 | | DIVP C.P | | 28099 | | |
| ı | DETT. | | 88701 | 1 | | Small Bowel p | 3.1 | 28093 | | |
| ı | PLEMONARY | | | | ٠. | Decrees . | | | | |
| ł | | | | <u> </u> | | UGI Sprice P | | 28093 | | |
| Į | DPF1s | <u> </u> | 68808 | | | SONOGRAPHY | | | | |
| | NEUROLOGY | | , | | | ☐ Abdomen P | | 60137 | | |
| ş. | □ DOPPLER: | | 68984 | | | □.OB/GYN P | ٠, | 60137 | | |
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☐ TRANSCRANIAL | | 68984 | · · | | ☐ Peivis P | | 60187_ | | |
| L | | 1 | 00004 | | | Scrotum P | | 60137 | | |
| 1 | NUCLEAR MEDICINE | - 1 | | · | | ☐ Thyroid P | <u> </u> | 60137
80137 | | |
| L | 🗋 Done Scan P | 1 11 | 68873 | 1 | | ☐ Head P | | 80137 | | |
| | ☐ Gelillam P | | 66873 | | | Other_south | | 80137 | $\overline{}$ | |
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| 8- | DPX P | | 68673 . | | | Head | | 88060 | | |
| | Renal P | | 65673 | | | Cervical Opine | - | 68060 | | |
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08088 | - | |
| Ī | ☐ RMCA. | | 68873 | | | ☐ Chest | - a. h. l | 68044 | | |
| Н | | | | 2 2 11 | | Abdomers* | 10/1 | _68044 | 1 | |
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| | 1 | NOAL | | | - | L Extremety | | 68046 | | |
| ĺ | J Y U | MILITA | | | | ☐ Head | | 68046 | | |
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☐ With GAD | | 68046
68046 | | |
| _ | OTTOMA DES | | SELECT - 1-1 | | 431.5 | -, | | 300 NO. 10 | | |
| - 1 | CLINICAL DAT | A □'Pe | matric Patit | inc for Padi | atric Reciolog | y (M-F 8am - 4pm) izx | 10 60136 | | | |
| 10 | Consent Obtained | 4 | | TOP YOU | MITIC Cardiolo | gy fax to 68373 | | | | |
| | 3 Respiratory Preçau | | | ri Surgery | F 12 2 1847 | | | | | |
| | 3 Wound/Skin Preca | nions Clinic | al History. | 31 1 July | 7 14 4 1 | | | | | |
| F | J Pregnancy | | _ | | | <u> </u> | | | | |
| L | · ser Service | For C | outuist Etin | dies: BUN | | Dreet. | 1 | | 117 | 1 |
| To | Ordering Physic | lan/NP | UNS | 11/1/ | Z_10 C/ | ide KVD | Beep | er# | 111 | 1 |
| ŧ | Date | [C] Time | L | A- | , Attending | | _, | | | |
| L | - Internation | 1 | 10- | U AVO | 7 | | - | | | |
| F | RN Signature | ν | | | | RN | | | | |
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| | | | | - | | 12 | | | - | |
| ьу | DIN9011 | | | | Page 1 | | | | 01-06-2 | 2015 21 |

DocType: ORDERS

PROCEDURE ORDER FORM

Many of the Radiology examinations require that the patient be prepared for the procedure that is being ordered. We have included a brief description of the most common procedures, HOWEVER, all exams are included in the Manual of Laboratory, X-Ray, and Special Procedures and are contained in the Ancillary Services section in this manual. The procedure in the manual contains a brief description, indications, contraindications, patient preps and special instructions.

Please call Pediatric Radiology x62554 for modified preps for pediatric cases.

NOTE: <u>SEQUENCING</u> of exame is ortical when ordering multiple exame. Barium studies generally should be done after other diagnostic procedures. See Manual for more complete information or discuss with Radiologist so as not to delay patient care.

G.i. Series

Prep: N.P.O. from Midnight day before study. Suspend all medication except essential.

Antispasmodics should be discontinued 24 hours before procedure.

Aftercare: mild laxative and fluids.

Barium Enema

Prep: Clear fluids 24 hours prior to study,

60 ml magnesium citrate by mouth at 6 PM day before study.

4 bisacodyl tablets (dulcolar) by mouth at 10 PM the night before exam.

1 bisacodyl suppository morning of exam.

Nothing by mouth after midnight.

I.V.P. (Intravenous Pyelogram) -

Prep: 10 ources of magnesium direte at 6 PM evening before exam. Nothing by mouth after midnight.

C.T. (Head & Body)

Prep: Clear fluids 4 hours prior to study. Contrast injection requires the patient be NPO for at least 4 hours prior to study. Patients must be cooperative and able to hold their breath for Body CTs. Aftercare: Patients receiving contrast should be hydrated.

MBI

CONTRAINDICATIONS: ① Patients over 300 lbs. ② Patients with PACEMAKERS CANNOT BE DONE. ③ Patients with metal surgical clips and other prosthetic devices should consult with the Radiologist before ordering MRI's. ④ Claustrophobia and inability to remain still are also contraindication and sedation may be required. SEE MANUAL FOR COMPLETE DETAILS.

Sonograms

PELVIC/OBSTETRICAL: Requires full bladder. Patient should drink water and maintain a full

ABDOMINAL/AORTIC RENAL: Clear liquid diet for 24 hours prior to exam.

Nuclear Medicine - SPECIAL CONSIDERATIONS:

- To obtain an adaquate study, patient must be able to lie quietly for up to one hour in supine
 position. Adequate sectation is absolutely negassary in the restless patient.
- For biliary, mecker's, cardiac, and any studies requiring seciation, the patient must be <u>fasting</u> for a minimum of <u>four hours prior to test.</u>
- Radioactive indine is used for thyroid uptake and soanning. Do not schadule test if any of the following drugs or foods have been ingested within minimal time limits indicated:

lodine Compound (Lugo's Potassium lodids, Kelp): 1-2 weeks Seafood, Ovaltine, vitamin pilis, Orande, Comold: 3-5 deys

Diodrast, Hypaque (i.e., IVP's and arteriograms): 1-2 weeks Priodax. Telepaque, etc. (i.e. gallbladder series): 3-6 months

Lipicdal (i.e., bronchograms): at least 6 months

Anti-fryrold druge (i.e., Propylthiouracii, Tapazole); 7 days. If irr preparation for urgent radiologine treatment, consultation is advised.

Thyroid substance (i.e., desiccated thyroid, Thyroxine): 4 weeks

Tri-iodothyronine (Cytomel): 10-12 days.

If special circumstances require evaluation despite the above indications (contraindications)

Nuclear Medicine physician consultation advised.



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01-06-2015 21:17:22

DocType: ORDERS NewYork-Presbyterian Hospital New York Weill Cornell Medical Center VIRGINIA L. BARFRIS. PHYSICIAN'S ORDERS EMERGENCY DEPARTMENT IF NO PLATE, PRINT NAME, SEX AND MEDICAL RECORD NO. Time: / 910 Date: Diagnosis: Allergies: Vital Signs: Routine a 1 hour 🗌 q 15 minutes Activity: Routine Bedrest Diet: ☐ NPO ☐ Regular Other: īV: ☐ Heplock ☐ Fluids: Oxygen: Jmin. Trace Mask Nasai Cannula Precautions: ☐ Airborne □ Droplet ☐ Wound/Skin Other: ☐ Cardiae Monitor □ ECG ☐ Foley Catheter Labs (circle): CBC/diff/pjts PT/PTT Retic. Ct. Lytes/BUN/C Glucose Ca Mg Amylese Admission Profi ESR LFTs Cardiac Enzymes ETCH level Aspirin level Acataminophen level Tox. Screen Urine HCG Urine C & S Serum HCG Type & Screen Type & Cross. Other: Medications, etc.: ☐ Tetanus & Diphtheria Toxolds 0.5 cc. IM HU HUZ HU05. MT7/9 DONE IN ED 1051 Zane in Emergency Department

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To: Sharon.Churcher@mailonsunday.co.uk[Sharon.Churcher@mailonsunday.co.uk]
From: Jenna Case 18-2868, Document 283, 08/09/2019, 2628241, Page581 of 883

Sent: Thur 2/17/2011 9:44:51 PM

Importance: Normal

Subject: RE:

Received: Thur 2/17/2011 9:44:51 PM

Not a problem but we have to continue rest of the interview at my house being that the children are not feeling well, you have got th only document s pertaining to my case. Look forward to seeing you this afternoon. Jenna

----Original Message-----

From: Sharon.Churcher@mailonsunday.co.uk Sent: Friday, 18 February 2011 7:25 AM

To: Virginia Giuffre

Hi there

Have been up all night writing. Won't have an opinion from our lawyer on how much can be published until London wakes up. The lawyers wanted internal FBI documents but I think the Justice Dept letter is all you have from the feds??? Anyway can I give you a call early afternoon? Maybe have a late lunch?

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Sharon.Churcher@mailonsunday.co.uk[Sharon.Churcher@mailonsunday.co.uk] Case 18-2868, Document 283, 08/09/2019, 2628241, Page583 of 883 To: From:

Sent: Sun 2/13/2011 4:29:38 AM

Importance: Normal Subject: RE: Agreements etc

Received: Sun 2/13/2011 4:29:38 AM

Hi Sharon, my address is

call me back for the directions from gosford and my hubby will lead the wa

from there.

----Original Message----

From: Sharon.Churcher@mailonsundav.co.uk Sent: Saturday, 12 February 2011 2:10 AM

To: Virginia Giuffre Subject: Agreements etc

Hi there.

Thank you again for your email.

We totally understand your concerns. Please don't worry about anything. Whatever happens, we are bound by confidentiality unless you consent to an article in a formal contract signed by you.

Since I will be in the air by the time you wake up, can you email our Assistant Editor Sian James -- sian.james@mailonsunday.co.uk -- your lawyer's information please?

Sian will arrange to get him whatever assurances he requires. We really want to make this work and of course we want to protect you.

We'll be really grateful if your lawyer will provide us his cell phone number as we'd like to sort this all out asap. Meaning we would like to talk to him Saturday EST.

I will give you a call from Sydney. Fingers crossed we get over this last hurdle!

Best regards, Sharon

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Received: Fri 2/25/2011 10:12:25 PM The flight logs didn't come through properly, could you please resend them? Thanks- Jenna ----Original Message----From: Sharon.Churcher@mailonsunday.co.uk Sent: Saturday, 26 February 2011 7:56 AM To: Virginia Giuffre Subject: Re: Can u look at the flight logs I just sent and see if any ring a bell re Virgin Is/Andrew orgy please? S X0 |From: |Sharon Churcher Date: |25/02/2011 20:54 GMT |Subject: | IRE: Hi shazza. I am hoping it all goes well this a.m, please let me know when you know something. As far as other publications go, I am happy for your company to decide as long as I am not made out to be a vixen...you know my taste...he..he..! Talk to you soon buddy! =) Jenna ----Original Message-----From: Sharon.Churcher@mailonsunday.co.uk Sent: Saturday, 26 February 2011 6:46 AM

Sharon.Churcher@mailonsunday.co.uk[Sharon.Churcher@mailonsunday.co.uk] Case 18-2868, Document 283, 08/09/2019, 2628241, Page585 of 883

To: From: Sent:

Importance:

Subject: RE: Re:

To: Virginia Giuffre

you know as soon as we get it.

Fri 2/25/2011 10:12:25 PM

Normal

Are there any publications to whom you do not want the piece syndicated? (You get 50 per cent of the proceeds).

So far it is all looking good. Waiting for a comment from Andrew. Will let

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| 2 FOR ACCEPTANCE AGENT'S USE Subscribed and sworn to before on FOIA: (b)(6) [Signature of person authorized to accept ap 3 APPLICANT'S IDENTIFYING DOCUME! DRIVER'S LICENSE BY THE SECOND OFFICE USE ONLY (App Both Certals are 58 CP CPV Seagont Brown's North Report of British Natural/Search Certains (CP) Seagont Brown's North Report of British Natural/Search Certains (CP) Search of Returned | 2.1 STOP DO NOT SIGN APPLICATION UNTIL REQUIRETED TO DO SO BY PERSON ADMINISTERING OATH Lingue not, since acquising universitates of septimental and the experiment of this stock and form linked supplication are presented as a time shall supplicate and on the supplication are true and to protect and not the supplication are true and to protect and not the supplication are true and to protect and not true. Applicator's Signature age 13 or older Core of Core of the supplication and true an |
| Parent sitegal Guardian & Signatur FOR ACCEPTANCE AGENT'S USE Subscribed and sworn to befinned before of FOIA: (b)(6) (Signature of person authorized to accept ap 3. APPLICANT'S IDENTIFYING DOCUME! DRIVER'S JOENISE SASSICH! OTHER (Specific PLA) FOR ISSUING OFFICE USE ONLY (App Both Collisions SR CR Cey Sassport Brain's Swarte Beroars of Birth Natural Shing, Charactering Cert. No. Other: | 21. \$TOP DO NOT SION APPLICATION UNTIL REQUIRETED TO DO SO BY PERSON ADMINISTERING OATH Lipper not, over a channing times States of accomply performing and of the acts briefly order. Acts of connections on the fewering of this application from Endess explanations statement is after read. I consecutive science of affect that the statements and on the acts briefly science of affect that the statements are described by applicant's Signature age 13 or older. The if identifying immoritated Applicant's Signature age 13 or older. Clearly Science age 13 or older. FOIA: (b)(6) |

| Case 18-2868, Document 283, 08/09/2019, 2628241, Page589 of 883 |
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| EXHIBIT 38 |
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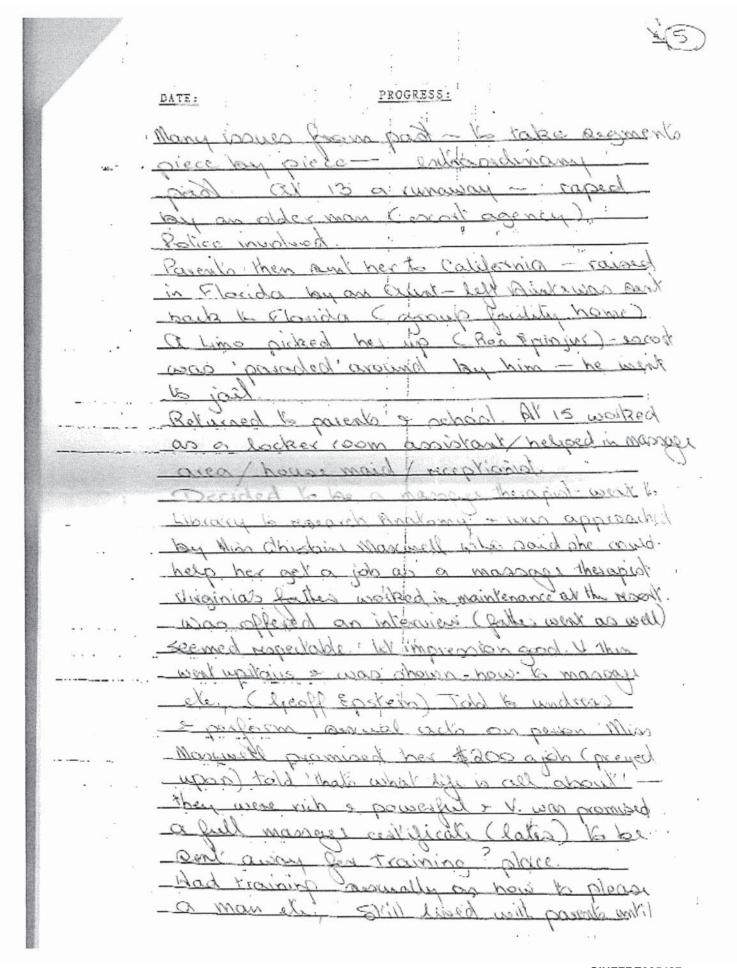
CASE HISTORY/ASSESSMENT PLAN

| ADDRESS: | | | |
|----------------------------------|--|--|-------------|
| | Glenning | Valley. | |
| PHONE NUMBERS: | | | |
| (H) | (W) | (_V | |
| AGE: 2:8 DOB:_ | RIVATE | HEALTH INS | |
| E | AMILY BACKGROUN | D/HISTORY | |
| SINGLE (Not in a relationship) | | - 17 | |
| SINGLE (In a relationship) - No | AME | AGE | |
| New long Description | on of partner | | |
| DE FACTO RELATIONSHIP | · NAME | AGE | |
| How long Description | | | |
| | And the second s | | |
| CHILDREN OF RELATIONSH | | | |
| SONS | | NAC ASSESSED BY THE PARTY OF TH | |
| DAUGHTERS: | | | |
| MARRIED: Name Row | sell. | AGE: U-V | |
| Flow long 9 4 Desc | cription of spouse | 1 | |
| Description of shared relationsh | ip: | - 0/20 V | |
| CHILDREN: | W AND CONTRACTOR OF THE CONTRA | 2 T 1 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 | |
| SONS: | | | |
| DAUGHTERS: | | ***** | |
| PREVIOUS MA | ARRIAGES/SIGNIF | ICANT RELATIONSHIP | es |
| 1. NAME | | | |
| | | Nay | |
| Reason relationship finished | 4 | | |
| Reason relationship finished | | | |

| | FAMILY HISTOR | O: | D 0 | - Clien |
|---------------------------------|-----------------------|--|-------------|----------------|
| NOTHER: AGE ST | HEALTH | Chan 1 12 | | 3 |
| MARITAL STATUS: MARRIE | D: SEPARATED DIVOR | CED: REMARKUED: | 1 2000 | Sodia cara |
| New partner: | | | | Codo Car |
| Relationship with Mother: Sel | | | | |
| DESCRIPTION OF MOTHER. (| | | ITIVE | 10 |
| SUPPORTIVE — SENSITIVE | | ** | ROLLING | , and area |
| MANPULATIVE DEPENT | | | | · of open |
| ENVIRONMENTAL/GENERA | | | | Lel abundanlic |
| DESCRIPTION OF RELATIONS | SHIP: | | | |
| CLOSE— VERY CLOSE — | STRAINED DISTAN | TNON EXISTENT | <u> </u> | _ |
| FATHER: AGE 53 | - HEALTH | | | 6) |
| MARITAL STATUS: MARRIE | D — SEPARATED — | DIVORCED - REMA | ARRIED | g W |
| NEW PARTNER | | | | |
| RELATIONSHIP WITH S | SELF | | | 84 |
| DESCRIPTION OF FATHER: C | ARINGLOVINGN | VURTURINGPOSTT | TVE | |
| SUPPORTIVESENSITIVE- | DOMINANTNEGA | TIVECONTROLLI | NG | 560 |
| MANIPULATIVE | ENTSUBSTANCE AB | USE | | |
| ENVIRONMENTAL/GENER | ATTONAL FACTORS: | *************************************** | | |
| DESCRIPTION OF RELATION | SHIP: CLOSE—VERY | CLOSE-STRAINED | | é |
| DISTANT NON EXISTEN | T | | | |
| SIBI.INGS - BIOLOGICAL/ST | EP/BLENDED | A STATE OF THE STA | | - |
| - 13 Would's
USB BROTHERS | 12 history | STERS | (4) | |
| 2 22 Danny | | | | |
| 50.0- | | | | |
| 90 aghe 1 cp | 92 | | | |
| Single /Married/de facto/Separa | ted/Divorced/Children | | | 6 |
| RELATIONSHIP: VERY CLO | SE CLOSEDIS | TANTNON EXIST | TM3 | |

| CHILDROOD/ADOLESCENT HISTORY |
|---|
| Major illnesses/operations <u>Kicknoy</u> problems |
| DESCRIPTION OF SELF AS A CHILD: BRIGHTHAPPYOUTGOINGLEADER |
| COMPLIANT LONERUNHAPPYHIGH ACHIEVERTROUBLED |
| DESCRIPTION OF SELF AS A TEENAGER: BRIGHTHAPPYOUTGOINGLEADER |
| COMPLIANT—LONERUNHAPPYHIGH ACHIEVERTROUBLED |
| RELATIONSHIP WITH PEERS/TEACHERS |
| EDUCATIONAL HISTORY |
| School leaving year HSC |
| Tertiary studies/University () |
| StudiedAT |
| Timespan |
| EMPLOYMENT HISTORY |
| Present position |
| Company Length of time |
| Plans for the future |
| PREVIOUS POSITIONS———————————————————————————————————— |
| |
| |
| MEDICAL & PSYCHOLOGICAL HISTORY (ADULT) |
| Significant illnesses/operations/trentment Stuffe White Ottobes |
| PRESENT GENERAL HEALTH COO A |
| MEDICATION |
| Substance abuse: Alcohol Excess Nicotine Other drug taking Manuscana Volume |
| PREGNANCY HISTORY: Number of pregnancies |
| Miscarriages Ectopic 13-19 entropica |
| Terminations (Effect/ reasonable/ bad/still affected by decision) |
| ANXIETIES/CONCERNS/FEARS |
| D Flashbacks (3) Anviely A righty (from book) with smily |

| PHOBIAS | |
|--|-----------------------------------|
| DESCRIPTION OF PRESENT PROBLEM | |
| TIME OF ONSET/SYMPTOMS | |
| SLEEP PATTERNS: Good/falls asleep easily/ reasonable/poor/diti | 1;
ficulty staying asleep/ |
| Awakens through night/ unable to go back to | sleep |
| AWAKENS FEELING: Good/tired/down/ Morning person/? | Night person |
| Awareness of mental disorder in family unit/origin | |
| MEMORY: Good/reasonable/poor - | |
| SUICTOAL THOUGHTS: Thoughts only/serious/contemplation | |
| Attempts and manner | |
| EPILEPSY - YES/NO | |
| RELAXATION/INTERESTS (Hobbies recreational interests) Walking/cooking/theatre/music/cinema/sport/bush walking/craft/wooking/theatre/music/cinema/sport/bush walking/cinema/sport/bush walk | lwork |
| Shared with partner | |
| Purpose/meaning of life: 90 Vac 16 host - | |
| Purpose/meaning of life: 30 136 1/2 1/2 1/2 1/2 1/2 1/2 1/2 1/2 1/2 1/2 | as no parm C |
| (C.ess.,/ Roics/int.cxt./Aut_Ind./Cen/Bal./Exsp./Exp./Resp.self/Ksnordiminished in reclaiming in | wint for them own (fort timenel / |
| Acknowledged - validation - recognitionws not - sif.) | |
| HYPNOSIS SUGGESTEDExplanation/description o | |
| HYPNOTIC FORMAT:Relaxation response/counting 1-20/Ideo | motor/eye catalepsy/ |
| HOW RECEPTIVE 1 2 3 4 5 6 7 8 9 10 APPROPRIATE FOR | |
| TREATMENT PLAN/FOCUS: Mindfulnes-based CBT challed Refear Cof 18my damps | icho for 62.2.0 |
| Remarkalde young woman - | suppositive theraps |
| | |



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| / | DATE: PROGRESS: |
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| | Loudled - used - av ig U wanted |
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| | - a chook prains & source in illander; |
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te: 7/25/06 PALM BEACH FOLICE DEPARTMENT Page:
ime: 8:47:53 Incident Report Program: CMS
                                                         Program: CMS3011
 Case No. . . : 1-05-000368
 SPECIAL NOTES : DO NOT RELEASE
Occur To Date : 1/27/05 0000
                                    Occur From Date: 1/27/05 0000
                                    Report Date . : 3/14/05 1600
 Day Of Week . : Thursday
 Common/Location: 358 EL BRILLO WY
 City . . . . : PALM BEACH, FL
 Location Type : RESIDENCE-SINGLE FAMILY
 Beat Assignment: DETECTIVE BUREAU Map Reference : 10
 Dept Class . . : SEXUAL BATTERY
                                     Report Officer : PAGAN, MICHELE
 Case Status . : OPEN / ACTIVE
                                     Case Status Dt : 3/14/05
 Supervisory Dt.: TRYLCH, JEFFREY 3/14/05
 Entry Date . . : OREGERO, LAURA 4/06/05
 Names? \dots :
                                     Property? . . :
 Vehicles? . . :
                                     Offenses? . . :
Narrative? . . :
                                     Related Cases? :
 ****** V E H I C L E I N F O R M A T I O N # 1 **************
Case number . : 1-05-000368
                            Category . . . :
State Veh Type :
                                    Year . . . . : 0
                                    Model . . . :
Make . . . . :
Model Name . . :
                                    Permit Number :
Style . . . :
                                    Color - Top . :
Color - Bottom :
                                    License # . . :
VIN . . . . :
                                    Stolen value . : 0
Disposition . :
                                    Insured . . . :
Insured by . . :
                                    Keys in car . :
Vehicle locked:
                                    Lein holder . :
Date recovered : 0/00/00
                                    Recovery value : 0
Street number :
City . . . . . :
Recovery code :
                                    NCIC number . :
Be On Look Out?:
****** P E R S O N
                      REPORTING INFO - # 1 *******
Case Number . : 1-05-000368
                                    Last Name . . :
Street Number :
City . . . . :
Birth Date/Age : T
                                    Employer? . . :
Occupation . . :
                                    Oper Lic No. . :
Home Phone No. :
                                    Race . . . . : White
Sex . . . . : Female
                                    Height . . . . : 0
Weight . . . . : 0
                                    Other Phone Nbr:
******** SUSPECT / ARRESTEE INFORMATION - #1 **
Case Number . : 1-05-000368
                                    Prompt valid in: ROBSON, HALEY
Street Number :
City . . . . : ROYAL PALM BEACH, FL 334121460
Birth Date . .
                                    Maximum Age .: 18
                                    Occupation . . :
Employer? . .
Oper Lic No. . :
                                    Home Phone No. :
Other Phone Nbr:
                                    Race . . . . : White
Sex . . . . : Female
                                    Minimum Height: 0
Minimum Weight: 0
                                    Maximum Height: 0
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te: 7/25/06 PALM BEACH POLICE DEPARTMENT Page: 2
ime: 8:47:53 Incident Report Program: CM9301L
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 Case No. . . : 1-05-000368
                                                         (Continued)
 Maximum Weight: 0
                                 Misc. ID# . . :
 Aliases? . . :
                                    MO/Crime Spec? :
 Hair Color . . :
                                    Hair Length . :
 Hair Style . . :
                                   Eye Color . . :
 Glasses . . . :
                                    Complexion . . :
 Facial Hair .:
                                    Build . . . :
                                    Speech . . . :
 Teeth . . . :
                                    Coat . . . . :
Hat . . . . . :
Shirt . . . :
                                    Pants . . . :
 Shoes
      . . . . :
                                    Body Marks #1 :
Body Marks #2 :
Body Marks #4 :
                                    Body Marks #3 :
                                    Status . . . : STILL SUSPECT
Arrest Case No.:
                                    Additional UCR?:
Case Number . : 1-05-000368
                                    Prompt valid in: KELLEN, SARAH LYNNELLE
Street Number : 358 EL BRILLO WY
City . . . . : PALM BEACH, FL 000033480
Birth Date . . :
                                    Maximum Age . : 25
Employer? . . :
Oper Lic No. . :
                                    Occupation . . : PERSONAL ASST/EPSTEIN
                                    Home Phone No. : 561/000-0000
Other Phone Nbr: 561/000-0000
                                    Race . . . . : White
Sex . . . . : Female
                                    Minimum Height : 0
Minimum Weight : 0
                                    Maximum Height : 0
Maximum Weight: 0
                                    Misc. ID# . . :
Aliases? . . :
                                    MO/Crime Spec? :
Hair Color . . :
                                    Hair Length . :
                                    Eye Color . . :
Hair Style . . :
Glasses . . . :
                                    Complexion . . :
Facial Hair . :
                                    Build . . . :
Teeth . . . :
                                    Speech . . . :
                                    Coat . . . . :
Shirt ...:
                                    Pants . . . :
Shoes . . . :
                                   Body Marks #1 :
Body Marks #2 :
                                    Body Marks #3 :
Body Marks #4 :
                                    Status . . . : STILL SUSPECT
Arrest Case No.:
                                    Additional UCR?:
******* SUSPECT / ARRESTEE INFORMATION - #3 **
Case Number . : 1-05-000368
                                   Prompt valid in: EPSTEIN, JEFFREY
Street Number : 358 EL BRILLO WY
City . . . . : PALM BEACH, FL 000033480
Birth Date . . :
                                   Maximum Age . : 52
Employer? . . :
Oper Lic No. . :
                                    Occupation . . :
                                  Home Phone No. :
Other Phone Nbr:
                                   Race . . . . : White
Sex . . . . : Male
                                    Minimum Height : 0
Minimum Weight: 0
                                   Maximum Height: 0
Maximum Weight : 0
                                   Misc. ID# . . :
Aliases? . . . :
                                   MO/Crime Spec? :
Hair Color . . :
                                   Hair Length . :
Hair Style . . :
                                   Eye Color . . :
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Date: 7/25/06 PALM BEACH POLICE DEPARTMENT Page: 3
Time: 8:47:53 Incident Report Program: CMS301L
 Case No. . . : 1-05-000368
                                                        (Continued)
 Glasses . . . :
                                    Complexion . . :
 Facial Hair . :
                                   Build . . . :
 Teeth . . . :
                                  Speech . . . :
                                   Coat . . . . :
 Hat . . . . :
                                   Pants . . . :
 Shirt . . . . :
                                   Body Marks #1 :
 Shoes . . . :
 Body Marks #2 :
                                   Body Marks #3 :
 Body Marks #4 :
                                   Status . . . : STILL SUSPECT
 Arrest Case No.:
                                   Additional UCR?:
 ****** V I C T I M
                          INFORMATION - # 1 **************
 Case Number . : 1-05-000368
 Prompt valid in:
 Street Number :
 City . . . . :
 Birth Date/Age : ]
                                   Employer? . . :
 Occupation . . : STUDENT
                                   Oper Lic No. . :
 Home Phone No. :
                                   Race . . . . : White
                                  Height . . . : 0
Misc. ID# . . :
 Sex . . . . : Female
 Weight . . . : 0
 Be On Look Out?:
                                   Other Phone Nbr:
 Victim Type . : JUVENILE
                                  Residency Type :
Residency Sts :
                                  File Charges . :
 Can Identify . :
                                   Victim Sobriety:
 Injury Extent :
                                   Injury Type 1 :
 Injury Type 2 :
                                   Hospital ID . :
Med Treatment :
                                   Phys First Name:
Phys Last Name :
Street Number :
City . . . . : PALM BEACH, FL 000033480
Birth Date/Age : 18
                                 Employer? . . :
                               Oper Lic No. : Race . . . : White Height . . . : 0
Occupation . . :
Home Phone No. : 561/000-0000
Sex . . . . : Female
Weight . . . . : 0
Be On Look Out?:
                                Other Phone Nbr: 561/000-0000
Victim Type . : ADULT
                                 Residency Type :
                                 File Charges . :
Residency Sts :
Can Identify . :
                                  Victim Sobriety:
Injury Extent :
                                  Injury Type 1 :
Injury Type 2 :
                                  Hospital ID . :
Med Treatment :
                                  Phys First Name:
Phys Last Name :
Street Number :
City . . . . : PALM BEACH, FL 000033480
                                 Employer? . . : '
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Date: 7/25/06 PALM BEACH POLICE DEPARTMENT Page: 4
Time: 8:47:53 Incident Report Program: CMS301L
 Case No. . . : 1-05-000368
                                                                (Continued)
                                   Oper Lic No. . :
Race . . . : White
Height . . . : 0
Misc. ID# . . :
 Occupation . . :
 Home Phone No. : 561/000-0000
Sex . . . . : Female Weight . . . : 0
                                      Other Phone Nbr: 561/000-0000
Residency Type:
File Charges . :
Victim Sobriety:
Be On Look Out?:
Victim Type . : JUVENILE
Residency Sts :
Can Identify . :
Injury Extent :
                                       Injury Type 1 :
Injury Type 2 :
                                       Hospital ID . :
Med Treatment :
                                        Phys First Name:
Phys Last Name:
******* V I C T I M I N F O R M A T I O N - # 4 *************
Case Number . : 1-05-000368
                                        Prompt valid in:
Street Number :
City . . . . : PALM BEACH, FL 000033480
Birth Date/Age : 17
                                       Employer? . . :
Occupation . . :
                                      Oper Lic No. . :
                                    Race . . . . : White Height . . . : 0
Home Phone No. : 561/000-0000
Sex . . . . : Female Weight . . . : 0
                                    Other Phone Nbr: 561/000-0000
Residency Type:
Be On Look Out?:
Victim Type . : JUVENILE
                                      File Charges . :
Residency Sts :
Can Identify . :
                                       Victim Sobriety:
Injury Extent :
                                      Injury Type 1 :
Injury Type 2 :
                                        Hospital ID . :
Med Treatment :
                                        Phys First Name:
Phys Last Name :
Street Number : City . . . : PALM BEACH, FL 000033480
Birth Date/Age : 18
                                Employer? . . :
                                      Oper Lic No. . :
Occupation . . :
Home Phone No. : 561/000-0000
                                    Race . . . . : White
                                      Height . . . : 0
Misc. ID# . . :
Sex . . . . : Female Weight . . . : 0
                                       Other Phone Nbr: 561/000-0000
Be On Look Out?:
Victim Type . : ADULT
                                      Residency Type :
Residency Sts :
                                      File Charges . :
Can Identify . :
                                       Victim Sobriety:
Injury Extent :
Injury Type 2 :
Med Treatment :
                                       Injury Type 1 :
                                       Hospital ID . :
                                       Phys First Name:
Phys Last Name :
******* V I C T I M
                              INFORMATION - # 6 ***************
Case Number . : 1-05-000368
Prompt valid in:
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Date: 7/25/06 PALM BEACH POLICE DEPARTMENT Page: 5
Time: 8:47:53 Incident Report Program: CMS301L
                                                              -----
  Case No. . . : 1-05-000368
                                                                                                                                         (Continued)
 Street Number : City . . . . : PALM BEACH, FL 000033480
                                     | The second | The
  Birth Date/Age :
 Occupation . . :
 Home Phone No. : 561/000-0000
 Sex . . . . : Female Weight . . . . : 0
 Be On Look Out?:
 Victim Type . : JUVENILE
 Residency Sts :
                                                                                   File Charges . :
 Can Identify . :
                                                                             Victim Sobriety:
Injury Type 1 :
Injury Extent :
Injury Type 2 :
Med Treatment :
                                                                                     Hospital ID . :
                                                                                     Phys First Name:
 Phys Last Name :
 Case Number . : 1-05-000368
                                                                                     Prompt valid in:
Street Number : City . . . : PALM BEACH, FL 000033480
                                                                                    Employer? . . :
Birth Date/Age :
Occupation . . :
Home Phone No. : 561/000-0000
                                                                                    Oper Lic No. . :
                                                                                    Race . . . . : White
Sex . . . . : Female Weight . . . . : 0
                                                                                  Height . . . : 0
Misc. ID# . . :
Other Phone Nbr: 561/000-0000
Be On Look Out?:
                                                                                 Residency Type :
Victim Type . : JUVENILE
Residency Sts :
                                                                                  File Charges . :
Can Identify . :
                                                                                   Victim Sobriety:
Injury Extent :
                                                                                 Injury Type 1 :
Injury Type 2 :
                                                                                 Hospital ID . :
                                                                                Phys First Name:
Med Treatment :
Phys Last Name :
******* V I C T I M I N F O R M A T I O N - # 8 *************
Case Number . : 1-05-000368
                                                                                   Prompt valid in:
Street Number :
lity . . . . : <u>PALM BEACH</u>, FL 000033480
                                    16
3irth Date/Age :
                                                                                   Employer? . . :
                                                                                   Oper Lic No. . :
Occupation . . :
Iome Phone No. : 561/000-0000
                                                                              Race . . . . : White
Sex . . . . : Female leight . . . : 0
                                                                                  Height . . . : 0
Misc. ID# . . :
                                                                                  Other Phone Nbr: 561/000-0000
e On Look Out?:
ictim Type . : JUVENILE
                                                                               Residency Type :
lesidency Sts :
                                                                                 File Charges . :
an Identify . :
                                                                                  Victim Sobriety:
njury Extent :
                                                                                   Injury Type 1 :
njury Type 2 :
                                                                                  Hospital ID . :
ed Treatment :
                                                                                   Phys First Name:
hys Last Name :
 ******* VICTIM INFORMATION - # 9 *************
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 Date: 7/25/06 PALM BEACH POLICE DEPARTMENT Page: 6
Time: 8:47:53 Incident Report Program: CMS301L
 Case No. . . : 1-05-000368
Case Number . : 1-05-000368
                                          Prompt valid in:
 Street Number :
 City . . . . : PALM BEACH, FL 000033480
 Birth Date/Age : 17
                                                 Employer? . . :
                                              Oper Lic No. . :
Race . . . : White
Height . . . : 0
Misc. ID# . . :
 Occupation . . :
 Home Phone No. : 561/000-0000
 Sex . . . . : Female Weight . . . . : 0
 Be On Look Out?:
                                                 Other Phone Nbr: 561/000-0000
 Victim Type . : JUVENILE
                                                Residency Type :
 Residency Sts :
                                               File Charges . :
 Can Identify . :
                                                Victim Sobriety:
 Injury Extent :
                                                 Injury Type 1 :
 Injury Type 2 :
                                                 Hospital ID . :
 Med Treatment :
                                                  Phys First Name:
 Phys Last Name :
 ****** V I C T I M
                                     INFORMATION - # 10 **************
Case Number . : 1-05-000368
Prompt valid in:
Street Number :
City . . . . : PALM BEACH, FL 000033480
City . . . . : PALM BEACH, FL 0000033480

Birth Date/Age : Oper Lic No. : Oper Lic No. : Oper Lic No. : White Sex . . . : Female Height . . . : O Misc. ID# . . . : Other Phone Nbr: 561/000-0000

Weight . . . : O Misc. ID# . . : Other Phone Nbr: 561/000-0000

Victim Type . : JUVENILE Residency Type : File Charges . : Can Identify . : Victim Sobriety:
Can Identify . :
                                                Victim Sobriety:
                                           Injury Type 1 :
Injury Extent :
Injury Type 2 :
Med Treatment :
                                               Hospital ID . :
                                                 Phys First Name:
Phys Last Name :
******** V I C T I M I N F O R M A T I O N - # 11 ***********
Case Number . : 1-05-000368
                                               Prompt valid in:
Street Number :
City . . . : PALM BEACH, FL 000033480
Birth Date/Age : 18 En
                                          Employer? . . :
                                          Oper Lic No. :
Race . . . : White
Height . . : 0
Misc. ID# . . :
Occupation . . :
Home Phone No. : 561/000-0000
Sex . . . . : Female
Weight . . . . : 0
Be On Look Out?:
                                          Other Phone Nbr: 561/000-0000
                                       Residency Type :
File Charges . :
Victim Sobriety:
Injury Type 1 :
Hospital ID . :
Phys First News
Victim Type . : ADULT
Residency Sts :
Can Identify . :
Injury Extent :
Injury Type 2 :
Med Treatment :
                                               Phys First Name:
```

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                               ···
 Case No. . . :-1-05-000368
                                                               (Continued)
 Phys Last Name :
 Street Number :
 City . . . . : PALM BEACH, FL 000033480
 Birth Date/Age : 18
                                      Employer? . . :
 Occupation . . :
Home Phone No. : 561/000-0000
                                      Oper Lic No. . :
                              Oper Lic No. . :
Race . . . . : White
Height . . . : 0
Misc. ID# . . :
Other Phone Nbr: 561/000-0000
Residency Type :
File Charges . :
Sex . . . . : Female
Weight . . . : 0
Be On Look Out?:
Victim Type . : ADULT
Residency Sts :
 Can Identify . :
                                       Victim Sobriety:
                                      Injury Type 1 :
Injury Extent :
Injury Type 2 :
                                      Hospital ID .:
Med Treatment :
                                       Phys First Name:
Phys Last Name :
Case Number . : 1-05-000368
                                      Prompt valid in:
Street Number :
City . . . . : PALM BEACH, FL 000033480
                                Employer? . . :
Oper Lic No. . :
Birth Date/Age : 16
Occupation . . :
                                  Oper Lic No. . .

Race . . . . : White

Height . . . : 0

Misc. ID# . . :

Other Phone Nbr: 561/000-0000

Residency Type :

File Charges . :

Wistim Sobriety:
Home Phone No. : 561/000-0000
Sex . . . . : Female
Weight . . . : 0
Be On Look Out?:
Victim Type . : JUVENILE
Residency Sts :
Can Identify . :
                                     Victim Sobriety:
                                   Injury Type 1 :
Hospital ID . :
Injury Extent :
Injury Type 2 :
Med Treatment :
                                      Phys First Name:
Phys Last Name :
Case Number . : 1-05-000368
                                      Prompt valid in:
Street Number :
City . . . . : PALM BEACH, FL 000033480
Birth Date/Age : 16
                                     Employer? . . :
Occupation . . :
                                     Oper Lic No. . :
                                   Race . . . : White Height . . . : 0
Home Phone No.: 561/000-0000
Sex . . . . : Female
Weight . . . . : 0
                                    Other Phone Nbr: 561/000-0000
Residency Type :
File Charges . :
Be On Look Out?:
Victim Type . : JUVENILE
Residency Sts :
Can Identify :
                                     Victim Sobriety:
Injury Extent :
                                      Injury Type 1 :
```

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 ______
 Case No. . . : 1-05-000368
                                                                    (Continued)
Injury Type 2 : Med Treatment :
                                         Hospital ID . :
                                          Phys First Name:
 Phys Last Name :
Case Number . : 1-05-000368
                                          Prompt valid in:
Street Number : City . . . . : PALM BEACH, FL 000033480
                                   O0033480

Employer? . . :
Oper Lic No. . :
Race . . . : White
Height . . . : 0
Misc. ID# . :
Other Phone Nbr: 561/000-0000
Residency Type :
File Charges . :
Victim Sobriety:
Injury Type 1 :
Hospital ID . :
Phys First Name:
Birth Date/Age : 19
Occupation . . : Home Phone No. : 561/000-0000
Sex . . . . : Female
Weight . . . : 0
Be On Look Out?:
Victim Type . : ADULT
Residency Sts :
Can Identify : :
Injury Extent :
Injury Type 2 :
Med Treatment :
                                        Phys First Name:
Phys Last Name :
Street Number : City . . . : PALM BEACH, FL 000033480
Birth Date/Age : 17
                                         Employer? . . :
Occupation . . :
                                         Oper Lic No. . :
                                      Race . . . . : White
Home Phone No. : 561/000-0000
                                        Height . . . : 0
Misc. ID# . . :
Sex . . . . : Female Weight . . . : 0
                                         Other Phone Nbr: 561/000-0000
Be On Look Out?:
Victim Type . : JUVENILE
                                        Residency Type :
Residency Sts :
                                        File Charges . :
Can Identify : : Injury Extent :
                                         Victim Sobriety:
                                        Injury Type 1 :
Injury Type 2 :
                                        Hospital ID . :
Med Treatment :
                                         Phys First Name:
Phys Last Name :
******* V I C T I M I N F O R M A T I O N - # 17 ************
Case Number . : 1-05-000368
                                         Prompt valid in:
Street Number :
City . . . . : <u>PALM BEAC</u>H, FL 000033480
Birth Date/Age : 16
                                        Employer? . . :
Occupation . . :
                                        Oper Lic No. . :
                                      Race . . . . : White
Home Phone No. : 561/000-0000
Sex . . . : Female
Weight . . . : 0
                                        Height . . . : 0
Misc. ID# . . :
                                      Other Phone Nbr: 561/000-0000
Residency Type :
Be On Look Out?:
Victim Type . : JUVENILE
                                     File Charges . :
Residency Sts :
```

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Date: 7/25/06 PALM BEACH POLICE DEPARTMENT
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 Case No. . . : 1-05-000368
 Can Identify . :
                                       Victim Sobriety:
                                       Injury Type 1 :
 Injury Extent :
 Injury Type 2 :
                                       Hospital ID . :
 Med Treatment :
                                       Phys First Name:
 Phys Last Name :
 ****** OTHER PERSON
                                        INFORMATION - # 1 ********
 Case Number . : 1-05-000368
                                      Last Name . . :
 Street Number :
 City . . . . : WEST PALM BEACH, FL 33411
Birth Date/Age : 14
                                     Employer? . . :
 Occupation . . : STUDENT
                                     Oper Lic No. . :
Home Phone No. : Sex . . . . : remale
                                      Race . . . : White
                                     Height . . . . : 0
Weight . . . . : 0
                                      Person Type . : OTHER PERSON
Other Phone Nbr:
****** OTHER PERSON
                                        INFORMATION - # 2 ********
Case Number . : 1-05-000368
                                      Last Name . . : MARCINKOVA, NADA
Street Number : 358 EL BRILLO WY
City . . . . : PALM BEACH, FL 000033480
Birth Date/Age : En 19 En
                                      Employer? . :
Occupation . . :
                                      Oper Lic No. .
Home Phone No. :
                                      Race . . . . : White
Sex . . . . : Female Weight . . . : 0
                                      Height . . . : 510
                                      Person Type . : OTHER PERSON
Other Phone Nbr:
****** OTHER PERSON
                                       INFORMATION - # 3 ********
Case Number . : 1-05-000368
                                      Last Name . .
Street Number : ROYAL PALM BEACH, FL 33411
                                      Employer? . . :
Birth Date/Age :
Occupation . . : Home Phone No. :
                                      Oper Lic No. . :
                                      Race . . . . : White
Sex . . . . : Female Weight . . . : 0
                                      Height . . . . : 0
                                      Person Type . : OTHER PERSON
Other Phone Nbr:
****** O T H E R
                       PERSON
                                        INFORMATION - # 4 ********
Case Number . : 1-05-000368
                                      Last Name . . :
Street Number : City . . . . :
Birth Date/Age :
                                      Employer? . . :
Occupation . . : PAINTER
                                      Oper Lic No. . :
Home Phone No. :
                                      Race . . . . : White
Sex . . . . : Male Weight . . . : 0
                                      Height . . . . : 0
                                      Person Type . : OTHER PERSON
Other Phone Nbr:
****** OTHER PERSON
                                     INFORMATION - # 5 *******
Case Number . : 1-05-000368
                                     Last Name . . :
```

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Date: 7/25/06 PALM BEACH POLICE DEPARTMENT Incident Report
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                                                       Case No. . . : 1-05-000368
                                                            (Continued)
 Street Number :
 City . . . . :
 Birth Date/Age : 0/00/0000 0
                                     Employer? . . :
 Occupation . . : FAMILY THERAPIST
                                    Oper Lic No. . :
                                     Race . . . . : White
 Home Phone No. : 561/000-0000
                                      Height . . . : 0
 Sex . . . . : Female
 Weight . . . . : 0
                                      Person Type . : OTHER PERSON
 Other Phone Nbr: 561/000-0000
                       ***EMPLOYER INFORMATION***
Case Number . : 1-05-000368
Employer Name : PBC DIVISON OF YOUTH AFFAIRS
Address . . . : 4200 N AUSTRALIAN AV
City/State/Zip : WEST PALM BEACH, FL 33407
Phone Number . : 561/840-4540
****** OTHER PERSON
                                       INFORMATION - # 6 *******
Case Number . : 1-05-000368
                                     Last Name . . :
Street Number :
City . . . . : WELLINGTON, FL 33414
Birth Date/Age : 16
                                     Employer? . . :
Occupation . . : STUDENT
                                     Oper Lic No. . :
Home Phone No. :
                                     Race . . . . : White
Sex . . . . : Male Weight . . . : 0
                                     Height . . . . : 0
                                     Person Type . : OTHER PERSON
Other Phone Nbr:
                       ***EMPLOYER INFORMATION***
Case Number : 1-05-000368
Address : : 4900 SUMMIT BV
                                    Employer Name : SUMMIT CHRISTIAN SCHOOL
City/State/Zip : WEST PALM BEACH, FL 33415
Phone Number . :
****** OTHER PERSON
                                       INFORMATION - # 7 ********
Case Number . : 1-05-000368
                                     Last Name . . :
Street Number :
City . . . . :
Birth Date/Age : 0/00/0000 0
                                     Employer? . . :
Occupation . . :
                                     Oper Lic No. . :
Home Phone No. :
                                     Race . . . . : White
Sex . . . . : Male
                                     Height . . . . : 0
Weight . . . . : 0
                                     Person Type . : OTHER PERSON
Other Phone Nbr:
****** OTHER PERSON
                                       INFORMAT<u>ION - # 8 *****</u>**
Case Number . : 1-05-000368
                                     Last Name . . :
Street Number :
City . . . . :
Birth Date/Age : 0/00/0000 0
                                     Employer? . . :
Occupation . . :
                                     Oper Lic No. . :
Home Phone No. :
                                     Race . . . . :
Sex . . . . : Female
                                     Height . . . : 0
```

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                                                                                 (Continued)
Weight . . . : 0
                                                Person Type . : OTHER PERSON
Other Phone Nbr:
                             PERSON
****** O T H E R
                                                    INFORMAT<u>ION - # 9 ****</u>****
Case Number . : 1-05-000368
                                                  Last Name . . :
Street Number :
City . . . . :
                                               Birth Date/Age :
Occupation . . :
Home Phone No. : 561/000-0000
Sex . . . . : Female
Weight . . . . : 0
                                                 Person Type . : OTHER PERSON
Other Phone Nbr: 561/000-0000
*********************** NARRATIVE #1 ***************
Original Report LO Reported By: PAGAN, MICHELE D.
                                                                                            9/20/05
                               Entered By .: OREGERO, LAURA D.
                                                                                            9/20/05
     On 03/14/2005, I received a call from a woman who did not wish to identify herself (later identified as that her fourteen year old step daughter (later identified as possibly may have been molested in Palm Beach by a wealthy man. According to the possible molestation by a third party. She explained that she had received a call from the mathem of her stord with the friend. The mether claimed to have
      mother of her stepdaughter's friend. The mother claimed to have
     overheard a conversation between her daughter and a male friend; they were talking about . The conversation was about how had met with a 45-year-old man and had sex with him and was paid for it. I advised that I would like to meet with her to obtain a more detailed statement and facts.
      to do and had to discuss the matter with her husband. At this point
          did not provide me with a call back number or any other
      information. She stated that she would contact me once she had spoken
      with her husband and s mother.
     On 03/14/2005 received a call from Mr. & Mrs.

It was all right to speak to their daughter via cell phone had been made aware of the case.
     They agreed to meet me at the police department later this date.
     On 03/14/2005, Mr. accompanied by his wife
     came to the Palm Beach Police Department where they advised
     me that they believed their fourteen year old daughter may have had
     some type of sexual relationship with an older male who resided in
     Palm Beach. Neither knew the suspect's name or address. Both stated
     that their daughter did not talk to them about the incident, nor would
     she admit to it.
                         identified his daughter as
     w/f, DOB
                              resides with her biological mother
                                                                                 is a twin,
```

| Date
Time | : | 7/25/06
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|--------------|--|--|--|---|---|---|--|---|-----------------|
| Case | he cu in fa | er sister arrently avoluntar acility of the color of the colors of the c | : 1-05-0003 resi attending ry admitted during the w she was adm that recentl les to provi | des with juvenile eek and c itted to y escalat | Mr. educations omes home the school ed. The f | school, ar facility on the week because of facility also | and and which is a state of the | Continuary ates wi | the |
| 2 | th
wi
li
(g
th
ha
wa
th | was income to make the close to | to Mrs. 10 6 2005. 10 and left. 10 lder gentle 10 by with h 11 ntroduced t 12 lder man. Su 13 girls come 14 e fast cash 15 eeps them a 16 and right s | They be man, thou er mother o Haley b pla picked u pposedly, over to h. The maround and ley other | lieve Hale gh they do . Mrs. Y ys basebal p , an the man h is house. n starts w does more than she | y initiated not have a furt, a boy so d drove to has a lot of the haley offer the a masser. The | I the related the related the respective to the respective to the respective to the related to t | cionshi Haley ined the cing ontinue where d often girls a e likes | p
at
d |
| | fo
th | e call f | talked of the mother trange that rom her mother and a leading transfer to the transfer transf | of
they were | a no longe
ng her of | hat she had
former fri
r friends w
the convers | end of until she r | s.
eceive | She
d
ard |
| | Pr
ex
ad
cl
Th
la
re | got i incipal, planatio ministra aim. Si ursday, ter that ceived t | told me nto a fight found over ns for the tion thought nce that day 02/10th or i night after he call from that she ostitute. | at school \$300.00 large sum t it was of y, difference continues to the continues of midnight t learned | of money. drug relation not ret 11 and re 1 It was mother, wa | purse. Initially ed but then urn to scho turned to h | gave diff
the school
dismissed
ol; she rater mother
after
that got i | Assist ferent l the n away s hous | e |
|] | pro | osecute a | who he signed the against the ear-old daug | affidavit
inappropi | of prosect | | ating he w | Isned | to |
| | Mr
wit | th his da
s moth
operate. | stated the aughter is a According ad any addit | about the aware of to Mrs. | ne incident | tions with
t. Mr.
ations and
she does no
the suspec | stat
also was w
t believe | ed that
illing
her | to |

| | | | 25 | £(| |
|--------------|--|---|--|--|-----------------------|
| Date
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: 8:47:53 | PALM BE | EACH POLICE DEPARTMENT Incident Report | Page:
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| Case | No : 1-05-000 her mother and then | 868
placed i | nto | (Continu | ued) |
| | school board records
disciplinary record to
was taken for a fight | for
cound.
such | I was advised if no disc
as an expulsion or deter
This was at the discret | Checking the nere was no ciplinary action the incide | = |
| | 03/15/2005, I called
message for PBSP Sgt. | the Pal | m Beach County Sheriff's
Keen, Child Abuse Unit. | office and lef | t a |
| | therapist. During an about the allegations anything had happened identified as Haley Fowed. Identified worked for a wealthy | Also
audiot
that w
, only
obson)
ified H
She u
man and | present was aped interview. I spoke ere made. init admitting to going with to Palm Beach to pick up aley Robson as the cousiltimately admitted to knossibly did sexual fawd offered her an opportunity | with Haley (later money Robson wan of her former wowing that Robsons for him. | as
Son |
| | lived in Palm Beach (explained the property of | later po
at she when the
sure ex-
ing ey the r
ld pick
xact dat
long wit
father's
going s
Robson r | shopping. It was later oicked his daughter up. | Jeffrey Epstein Robson to go wi According to with Robson bu became angry w belie stated Robso Sunday. Inday. Accordin Hispanic female told he confirmed by | th
hen
wed
n |
| | Sometime on the way to
whereby Robs | here, a | og with the unknown fema
conversation occurred be
that if Jeff a
by she was eighteen. | etween Robson a | |
| e
F | three girls walked up
guard/security room.
them asking what they | a drive
In fact
wanted. | s house was on a dead end
eway, past what appeared
t, recalled a man
Robson stated they we
to continue walking up | to be a small
ale approaching
re there to see | |

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stated the man told them that Epstein was not there but was expected back. He allowed them to enter the house, via the kitchen. He offered them something to drink while they waited inside. Shortly after, Epstein and a woman, described as white with blond hair entered the kitchen.

Believed the woman was Epstein's Assistant.

added that the woman did not seem friendly and kept her responses short and direct. Epstein introduced himself to as Jeff.

got the impression that Epstein and Robson's friend knew each other.

described Epstein as being approximately forty-five years old, a long face, and bushy eyebrows, with graying hair.

Robson and Epstein left the kitchen leaving and Robson's friend alone in the kitchen. They returned a short time later. They all spoke briefly in the kitchen. While speaking to me, became upset and started to cry. Stated the woman instructed her to follow her upstairs, which she did. According to the woman led her to a room that had a massage table in it. The woman started to fix up the room, putting the covers on the table and taking lotions out. She then told second. The woman left the room, and soon after, Epstein walked in and told to take off her clothes. As was telling me what had happened, she looked away from me, and with a pointed finger, repeatedly pressed it into her thigh. Stated he was stern when he told her to take off her clothes. Said she did not know what to do as she was the only one there. Sook off her shirt leaving her bra on. Epstein, dressed in a towel told ner to take off everything.

Her thong panties on. Epstein then instructed her to give him a massage pointing to a specific lotion for her to use. Epstein laid on the table, face down. As the companies of the companies

described Epstein's house as a two story pink house with a Cadillac Escalade parked in the driveway. There were gates leading into the property. From the kitchen, feecalled walking up a flight of stairs, lined with photographs, to a room. Upon entering

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|--------------|--|--|---|---|---------------|
| Case | No : 1-05-000 the room there was a hot pink and green s the sofa. the room, as well as | large bathroom to ofa in the room. The recalled there being | here was a door on
g a mural of a nak | each side | ed a
e of |
| . * | off his towel, expose hairy especially on a continued to his but asked if she no. then so because he was a "rea would explain." | tocks. A knew what being controlled that she thought ally built guy and him that when she stated to the stated to | recalled Epste also had a hairlimitted to seeing hircumcised meant at Epstein was on sois wee wee was vested "wee wee" she when he took his | in being ne that is penis. nd she sta teroids ry tiny." meant pen | I
ated |
| | massage, telling her Epstein got up from thim making, what she He then returned to the Epstein then turned to As she did this, Epstein the this this this this this this this this | the table and went to
believed to be sexu
the room where he ac
over and instructed | recal
to the bathroom who
hal type of noises
gain laid down on to
to massac | lled that
ere she he
(moaning
the table.
Te his boo | ard |
| | resumed mass on the ground. Epste ground started to ruk stated Epstein held chest, back and shoul because he had to use table. | o his penis in an up
on to the small of hader area.
In the towel to wipe | de, and with the to and down motion. er back as she mass recalled Epstein himself as he got | ssaged his
ejaculati
off the | he
ng |
| | Epstein then left the downstairs where she admitted to getting pure Before they left, Epster As they were leaving and how much she was jealous when she told Haley stated received stated that she belief bringing her. | met Haley and the used the number of the house. Haley as paid. State that she receif only two hundred d | nknown white femal ollars in cash fro to leave her phonked what ted Haley seemed uved three hundred ollars that day. | e.
om Epstein
de number.
had happe
dpset or
dollars. | • |
| E . | Robson told be rich; agr sure where Possibly never saw Robson agai not spoken with Robso | n as she got into a | t shopping, though
all's. s
fight at school. | she is no
tated she
She had | ot * |
| | I asked if s | he was aware of any
ted no. | video equipment w | hile she v | vas |

| 531 | | | the second | |
|--------------|---|--|--|---|
| Date
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| Case | No : 1-05-00 | 0368 | . s | (Continued) |
| (e) | or her family if sh | ther father's o telling became guessed that and now there | the police regar
vehicle was rece
what had happen | ntly vandalized.
ed with Epstein |
| | I then talked to color sweater she w intercourse with Ep again admitted to o | stein. She der | nied touching his | We talked about the ving sexual penis. |
| = | agreed to
phone call to Robso
and advised her of
willingness to coop
interview were place | n in a controll
the families' a
erate with this | ed setting. I me set investigation. | 1 S |
| ı | I made contact with advised her briefly incident and stated that her daughter with that it was her opin recalled hearing her admitted that she disconfront her daughter something to the effect money. I made the state of the daughter of the daughter. It was may have known about and was an ongoing investigation of the state of that I had contacted | of my investige that she overhold having with all his both of daughter called not listen the about it lated that she as this because had gotten into stigation and results are all the results | ation. She was a leard a portion of a boy named girls liked ing a who the entire conver. I told had slept with would not object belief that every of the fight that o. I reminded equested she not | t a conversation stated nore. Versation but did her mother that the an older man for to me speaking with yone in the school ther daughter that this |
| | On 03/16/2005, PBSO returning my call. and inquired if he hresided in Palm Bead offered any assistanthat due to the age interview them and e | I spoke with K
and any open al
th. Keen state
ace if needed.
of the parties | een and discussed
legations or case
d he was unaware
Keen stated it wa
involved, it wou | I the case with him es where the suspect of any. Keen as his experience ald be difficult to |
| | Recause of the time | delay there w | es no need for th | e vietim to be |

which coordinating a day and time to obtain a statement could be made.

On 03/17/2005, I queried Jeffery Epstein on the internet and obtained

obtaining evidence. There was also no need to take her to CPT as she was already in a juvenile facility, with an assigned therapist, in

taken to a medical facility for a physical for the purpose of

| ate
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CMS301L |
|-------------|--|---|--|--|---------------|
| lase | No : 1-05-00 a photo of Epstein at which trecognized Epstein the photo line up uplaced into evidence | to be used in a prime she viewed the and pointed to him ander Epstein's prime to be a second to the | ne photo line up. im (Position #5). | She immediate | ely
ned |
| | On 03/18/2005, I me
placing a controlle
and asked if she co
stated that she wou
copy of this conver | ed call to Haley B
ould arrange anoth
old have to call h | Robson. Robson and meeting with Jenim and make the and mand make the and make the and make the and make the and make the a | spoke with Rob
eff. Robson | oson |
| | 03/19/2005, I spoke advised that uncle. | with left the scheduled to ret | and
state to visit wit
urn to Florida on | and was
th her aunt ar
03/27/2005 | ıd |
| | 03/21/2005, I coord
surveillance on 358 | | F Unit and OCVAN t | o initiate | |
| | 03/21/2005, Coordin
El Brillo. On this
appointment to spea
counselor was reluc
assured her that I
an unmarked vehicle | k with . She
tant to have poli
would respond to | ed
stated the school
ce presence at the | to schedule a
guidance
school. I | in : |
| | call an appointment to s | | vised that I did n | ot need to ma | ke
® |
| ı | I received a return
would be a | phone call from ttending the fami | sta
ly therapy session | ting that . | |
| | I received messages | from | | | |
| | I conducted a compu-
indicated the most :
the state of Florida | recent driver's l | icense on file for | of this query
Epstein was | for |
| | A cross reference of revealed the follow Mark L. Maxwell, uk/f, dob history. | ing affiliated na
Epstein, w/m dob | mes: Nada Marcinko
& Ghi | va, w/f, dob
slaine N. | |
| : | on 03/23/2005, I spongered that she is a like the fact that the fact that | not discuss the indicate did not want the that and | ncident with anyon investigation com have not been que | e including he promised. I setting along a | was
due |
| (| on 03/29/2005, I pla
residences | aced telephone cal
requesting to spe | lls to both the | and
rding the | |

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Time: 8:47:53 Incident Report Program: CMS301L
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                                                                                                           (Continued)
        investigation. I received return phone calls from Mrs.
        Mrs. and advised them that I would be contacting
          s family therapist to coordinate a time to meet with
        was at the request of both and Mrs. that is strict classroom and therapy schedule be disrupted as little as possible. I also updated them to the investigation thus far. Both and stated they had no objection to my meeting with In
        speaking with Ms. she identified the cell phone number of
                          as being the phone assigned to
               had no objections and provided consent to giving it to the
       police department for the use of placing controlled phone calls from
       it. stated the phone had been taken away from as part of her punishment for not doing well in school. According to
             used to be an excellent student, but in the past two
       months has become irritable, verbally abusive to the family and has
       run away. stated her daughter's recent behavior is the opposite of what she normally is. stated they are going through family therapy sessions with the school but none of this had
       come up. Arrangements were made for Det. Captain Gudger to retrieve
       the cell phone from at her place of employment.
       I called and requested to speak with Ms. Upon speaking with Ms. she advised me that she was in the middle of therapy sessions and would call me back once the
       sessions were completed. Ms. stated the sessions should be
       concluded by 7:00 PM. At approximately 8:00PM I had called Ms.
       at which time I left a message on her voice mail requesting a return
       phone call. I spoke with Ms. and advised her that I did not meet with her daughter and that I would again attempt to coordinate a
       time with the counselor so as not to disrupt school schedule
      had no objections. Shortly after speaking with Ms.

I received a call from Ms.

I explained the situation and requested a time to meet with the reviewed advised that would be available after 3:00PM.
      On 03/30/2005, I met with Ms. and and at I reminded of her conversation with Robson. During this time initiated a conversation with me in which she admitted that she was not telling me everything that had happened
       during the time she was alone with Epstein. According to
      while she and Epstein were alone on the second floor Epstein used a purple vibrator to massage her vaginal area. Stated there was no penetration as the vibrator was on top of her underwear. I asked if Epstein ever asked her age and she stated he had. Stated she told him she was eighteen. When Epstein asked what school she was in, responded she was in the twelfth grade at Wellington. During the course of this incident, stated Epstein told her that Haley had worked for him for years.
      We then continued with the controlled call to Robson. At approximately 3:350m from her cell phone, made a call to Robson s home, Robson was not home. was told
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| Date
Time | : 7/25/06
: 8:47:53 | PALM BEACH POLICE DEPARTMENT
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|--------------|--|---|---|---------------|
| Case | No : 1-05-00 that Haley Robson W cell phone, Olive Garden Restau | 0368 as at working a double and could b W/F, Haley Robson is emp rant, located on Forest Hills Blvd | (Continue reached on language of the continue | ner |
| | and she had heard rumor asked if they, mean claimed to have hear Jeffrey. know anything about someone to work tome | son. During the conversation between Robson asked what happens in the was going to press chains a parents, knew about Jefferd that so | ed, stating the rges. Robson fery. Robson dout about rents) did not at Epstein needle. Robson | nat |
| | attention, drawing of
whenever she claimed
afternoon at Epstein
her knees propped up
tell me the all the | f these conversations with be articulate and well spoken. She immature manner, by looking around, on a paper. would offer much to have told me the truth in the mis house. would sit in the property to her chest as she admitted that details of her encounter with Epsta means of positive reinforcement in the manner of the property of the means of the property of | , not paying me a high five details of th the chair, wit she did not cein during ou | e
le
lh |
| | On 03/31/2005, subpo
and Cingular Wireles
numbers) were drafts | | phone | *) |
| | On 04/01/2005, I met
conducting surveilla | with members of PB BSF Unit for tance on 358 El Brillo. Cross-refer | the purpose of
mence suppleme | nt. |
| | Department who provi
Mr. Epstein. It rev | with Det. Krauel of the Palm Beachded me a copy of the concealed weak
wealed Epstein had a valid permit. | pons permit f | or |
| | identification of th | queried various different web site to purple item retrieved from the titem was similar in description as and used by Epstein. | rash pull from | ble
m |
| | | Spicygear.com and spoke with the o | | |

04/06/2005, I conducted business queries into Epstein utilizing the internet. I located articles relating to financial reports. There was no local history.

at sex shops in South Florida.

items as a Jelly Anal Wand of some sort. The item is easily available

On 04/01/2005 - 04/03/2005, with the assistance of BSF, there was

Date: 7/25/06 PALM BEACH POLICE DEPARTMENT Incident Report PALM BEACH POLICE DEPARTMENT Page: 20
Incident Report Program: CMS301L Case No. . . : 1-05-000368 (Continued) continued surveillance on the property. On 04/04/2005, I obtained a copy of voice mail messages, dated 03/31 and 04/01 from Haley Robson to A female identifying herself as Haley states that she could pick up to take her to Epstein's house for an eleven o clock appointment. A copy of this was placed into evidence. On 04/05/2005, a trash pull was conducted at 358 El Brillo by Det. Lee and me. There were several messages written on various forms of papers. There was a message from Haley, indicating following was additional information obtained from trash retrieved from 358 El Brillo: Jean Luc 6:20 AM; David Friday 5:30PM; Haley; a message receipt dated 4/4 1:05-She is looking to speak to you .; On 04/06/2005, I faxed subpoena requests to SA Mighdolls office for Epstein, Robson and s phone records. (Phone numbers On 04/06/2005, I called 9 and spoke with Principal

He confirmed that they had a student by the name of

He requested a written request prior to releasing any additional information. On this same date I faxed a request for student and parent information on I advised that due to this being an open investigation he was not to discuss the matter with anyone. On 04/08/2005, I received a message from following information: , w/m DOB wellington, Florida. Parents name: Det. Lee provided me with trash obtained from 358 El Brillo for 04/06 04/07/05. The following information was retrieved: Jet Aviation itinerary, indicating a departure date of 04/05/2005 at 4:00 PM with an arrival in New York City of 6:15PM. Flight crew captain David Rodgers, co-captain, Larry Visoski, flight engineer Larry Morrison. Call sign N908JE; a note stating Bye J. thank you hand written notes & messages 11-Glenn, 12:30 chicken,

4. 3 September B & J, Big Screen x8, work Sunday @

Monday after school?; left message for works 4-9 Monday and Tuesday, leaves @

11:30 AM; will be here tomorrow @ 10:30 Am; Mrs. school @ 11:30 AM; Business . There was no trash for 04/08/05. 04/22/05 received the results of a subpoena request from Bellsouth for The results only provided subscriber information. I contacted Alice Grant Investigative Subpoena Compliance Center who stated the request was not complete and the results would be sent to

| | | | | | | | 9 |
|--------------|---|---|---|---|----------------------------|--|---------------|
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| | well as phe
trash pull
acquainted
DL | s, I identi: with someon | , which wer
fied the be
ne at 358 E | e obtained in force mentioned in Brillo. DOB 198 | d individua
DOB | als as being | 7 |
| v * | investigat:
school. He
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ion.
er contact the phones.
go anywhere | stated
with the ou
come | and that was tside 1s limits s home on the | doing well | l in the | re
lot |
| | On 05/11/20 | 005, I made | arrangemen | ts to meet wit | th | and | |
| | They will he the next fe | ew weeks but | GA in Jul
would be | ith
y 2005. They
available via
tter further. | will be ve | ling the cas
ery busy ove
.ll coordina | r |
| | During this at the airp | week I corport, but the | nducted sur
here was no | veillance at E
thing to indic | Epstein s r
cate that E | esidence an
pstein was | d
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with Ms. | licting app | ointments, | rescheduled y | until 06/02 | /2005, to m | eet |
| | I also spok | e with | | and updated h | ner to the | investigati | on. |
| | On 06/02/20
that she co
provide me | 005, I met would be read with her ne | with the contact is | and rell phone uninformation. | intil she i | advised
s able to | |
| | | eived a mess
e was busy. | | | Attempte | d call back | |
| | | | | ation that Eps
Lee regarding | | | |
| | | working to | | ked for Haley
would indicat | | | |
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and | requests to SA | (Phone num | mbers
iginal | |
| | | | | pull arranged | | | |

Date: 7/25/06 PALM BEACH POLICE DEPARTMENT Page: 22
Time: 8:47:53 Incident Report Program: CMS301L Case No. . . : 1-05-000368 misc. female hygiene products in the trash. Based on a prior Auto Track report done on 358 El Brillo, a possible subject residing at the residence is Nada Marcinkova. Marcinkova fit the description provided by officers who had conducted surveillance in the area of a female seen entering and leaving the residence. On 07/21/05, I received the Duces Tecum dated 07/18/05, which was clerked by ASO On 07/26/2005, I received the results of Bell South Subpoena. On 08/04/05, I received DHL Express from T mobile with the results of the query. who confirmed that I spoke with was still living out of state. It appeared that all was going well. I left a message for On 08/08/2005, I received the results of Cingular cell phone subpoena. During the week of 09/08/2005, I checked 358 El Brillo and the Palm Beach International Airport but there was no direct indication that Epstein was in town. On 09/08/2005, I reviewed the case notes of this file, as the case will be turned over to Det. Recarey. On 09/11/2005, while on patrol, I conducted a check at Epstein's residence and found that it still had the hurricane shutters on. On a drive by the Palm Beach International Airport later that afternoon, I did not observe Epstein's plane. On 09/14/2005, I conducted a check at the Palm Beach International Airport but did not see Epstein s plane. On 09/19/2005, I spoke with to keep her updated and to find out if there was any change of address or phone numbers for I was told no. I left a message for at at in order to provide her with Detective Recarey s information. *********************** NARRATIVE # 2 ***************** Reported By: RECAREY, JOSEPH NA 9/21/05 Entered By.: ALTOMARO, NICKIE A. 9/21/05

On September 19, 2005, I met with Officer Pagan and received the information pertaining to this case. Members of the Burglary Strike Force had previously been conducting surveillance on both Epstein and Robson. Officer Munyan was assigned to monitor the Epstein home and Sgt Sorge and Officer Minot were assigned to monitor Robson. Both teams provided a surveillance log that will be placed into the

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(Continued)

Det. Dawson was assigned to relieve Officer Munyan at 4:00 pm; he informed me that at approximately 8:00 pm, Epstein had left for the airport and his private jet was sitting on the tarmac. Epstein's private vehicle drove to the jet and unloaded packages into the jet. It appeared that Epstein left the county at this time. Surveillance will continue to determine when Epstein will return.

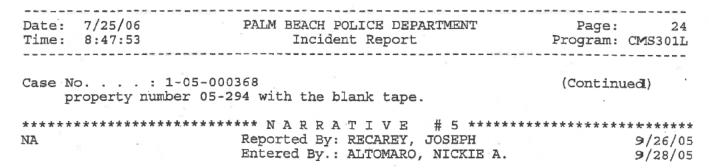
Inv Continues.

On Friday, September 23, 2005 at approximately 1:45 p.m., I began to copy a tape micro cassette, under case number 05-368 and property number 05-243, tape number 1. I placed the tape in the telex copy-et, series 2 machine and began to go through the copying process. Approximately 1/2 through the tape, the tape wrapped around the spindle and became locked and stretched the tape. I examined it and determined that it was in the best interest to leave it as it is as a prior copy had been made and turned over to Sergeant Frick. I immediately took the tape to Sergeant Frick and allowed him to examine it and then obtained the copy from him and Detective Recarey and brought the copy of the tape down and made a copy for him based on that. The tape was placed back in the original container and is retained in the evidence bag under the previously mentioned property number of 05-243. It is not advisable to attempt to copy this tape as further damage could result to the recorded material and there is an existing copy anyway.

On 3-24-05 at 11:00 pm, a copy of tape 2 (case number 05-294) had been made for Det. Pagan by Evidence Specialist Annette Badger. The copy was turned over to Detective Recarey.

On Friday, 09-23-05 at approimately 2:15 pm, I was in the process of reproducing audio tapes (micro and standard) to standard size when it was discovered, in the test review process, that tape number 2 was blank. I notified Sgt. Frick and Det. Recarey. I was informed that they had a prior copy and I could use it to make a master tape. I did so and when reviewing and signing the evidence sheet, I noticed Evidence Specialist Badger had written "#2 is blank."

I obtained that copy from Det. Recarey and made a new copy on a standard size tape. The new copy was placed in the evidence bag under



Copies of the tapes that were submitted into evidence were requested. Additionally, trash pulls were started on September 21, 2005. Sqt. Szarszewski made telephone contact with Tony Higgins, Supervisor of the Sanitation Department, and requested that trash be collected at the Epstein House located at 358 El Brillo in Palm Beach. Sqt Szarszewski met with Sanitation worker, Jeff Williams and observed him enter the property at 358 El Brillo. Shortly thereafter, Williams exited the property and placed the three white trash bags in the empty well in the rear of the truck. Williams then drove away where he met with Sgt. Szarszewski who removed the bags from the well and placed them into one large black trash bag. The bag was returned to the Police Station where I was waiting for him. Upon his arrival, we inspected the bags where several notes and papers were found. These notes contained names of girls with times. Additionally, there was a note from and to Jeffrey Epstein on a notepad, which stated, "For a good time call and at "." Also, there was another telephone number on the note Also found was a written note, which stated, can not come at 7 p.m. tomorrow because of soccer. These items were written on notepads that contain Jeffrey Epstein on the bottom of the notes. These items were placed into evidence for future follow up. I requested subpoenas for subscriber information on the telephone numbers listed above on the note from and . The cellular telephones and are both assigned to Cingular Cellular Service. Other notes were found within the trash on Jeffrey Epstein pad, papers that contained telephone numbers. One note had "with written on it. This cellular number is assigned to Cingular Cellular Service. Another sheet had written which is assigned to Bell South Telecommunications. The subpoenas were picked up and submitted to Cingular and Bell South Telecommunication for subscriber information.

On September 22, 2005, I was informed by Sgt. Szarszewski that there would be no trash pick up as it was recycle pick up day. A request for copies of the micro and standard size cassettes were requested from crime scene to familiarize myself with the interviews conducted.

On September 23, 2005, the tapes were received and I began to become familiar with the interviews that were conducted. Det. Krauel had met with Town of Palm Beach Sanitation worker, Jeff Williams and observed him enter the property of 358 El Brillo. Shortly thereafter, Williams exited the property and placed the three white trash bags in the empty well in the rear of the truck. Williams then drove away where he met with Det. Krauel who removed the bags from the well and placed them into one large black trash bag. The bag was returned to the Police Station where I was waiting for him. Upon his arrival, we inspected

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the bags where several notes and papers were found. The notes will be inspected for future use. The items collected were placed into evidence.

It became evident that some of the recordings were recorded with background noise and some interference. The calls most affected were the control phone calls from the victim to the suspect Haley Robson. I obtained the graphic equalizer and discovered that the calls are able to be legible with the use of the equalizer by lowering the background noise and increasing voice gain. I also learned that a tape was broken during the coping of the tape. I returned the copy of the tape marked Property Number 05-243 to have it recopied to have an original in evidence and a working copy with the file.

Upon researching the file, it was discovered that the suspect, Haley Robson's cellular calls were subpoenaed incorrectly. The suspect telephone number was and the original request was for I requested the information through Cingular Cellular Service from February 2005 through the present. The purpose was to have a record of Robson making calls to victim, Jeffrey Epstein and the frequency of calls. The request was submitted to the State Attorney's Office.

Investigation Continues....

On or about September 23, 2005 at approximately 0915 hours, I responded to 358 El Brillo and met with PB Sanitation worker Jeff Williams. Williams had been previously notified to assist in trash pulls at the residence of Jeffrey Epstein, 358 El Brillo, Palm Beach, Florida. I observed Williams enter the driveway of 358 El Brillo and remove several plastic bags of trash and place the contents into the back of an empty sanitation truck.

I then followed Williams to a predetermined location and seized the trash from the truck. The trash was transported to the Palm Beach Police Department where I began sifting through its contents. There was a total of 4 white in color plastic bags and each contained documentation and correspondence for 358 El Brillo and Jeffrey Epstein. All documents of evidentiary value were removed and turned over to Det. Recarey for follow-up.

On or about September 26, 2005 at approximately 0900 hours, I responded to 358 El Brillo and met with PB Sanitation worker Jessie Jones. Jones had been previously notified to assist in trash pulls at the residence of Jeffrey Epstein, 358 El Brillo, Palm Beach, Florida. I observed Jones enter the driveway of 358 El Brillo, where no trash was located within the receptacles. I left the area without incident

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and notified Det. Recarey to that affect.

On or about September 27, 2005 at approximately 0915 hours, I responded to 358 El Brillo and met with PB Sanitation worker Jesse Jones. I observed Jones enter the driveway of 358 El Brillo and remove one plastic bag of trash and place it in the back of an empty sanitation truck.

I then followed Jones to a predetermined location and seized the trash from the truck. The trash was transported to the Palm Beach Police Department where I began sifting through its contents. There was a total of 1 white in color plastic bag which contained correspondence for 358 El Brillo. All documents of evidentiary value were removed and turned over to Det. Recarey for follow-up.

On or about Monday October 3, 2005 at approximately 0915 hours, I responded to 358 El Brillo and met with PB Sanitation worker Jeff Williams. I observed Williams enter the driveway of 358 El Brillo and remove several plastic bags of trash and place the contents into the back of an empty sanitation truck.

I then followed Williams to a predetermined location and seized the trash from the truck. The trash was transported to the Palm Beach Police Department where I began sifting through its contents. There was a total of 7 white in color plastic bags with a red tie and 1 black in color bag which contained 2 white in color plastic bags with a red tie. Each of the bags contained documentation and correspondence for 358 El Brillo and Jeffrey Epstein. Inside of one of the white in color bags, I located a broken piece of a hard plastic or clear acrylic stick, which was shaped with small ridges. This device is commonly used as a sexual toy which is inserted into the vagina or anus for stimulation. This item, along with all documents of evidentiary value were removed and turned over to Det. Recarey for follow-up.

On or about Tuesday October 4, 2005 at approximately 0928 hours, I responded to 358 El Brillo and met with PB Sanitation worker Jeff Williams. I observed Williams enter the driveway of 358 El Brillo and remove several plastic bags of trash and place the contents into the side well of the sanitation truck. This side of the truck is separate from the rear of the truck and does not come into contact with other trash.

I then followed Williams to a predetermined location and seized the trash from the truck. The trash was transported to the Palm Beach Police Department where I began sifting through its contents. There was a total of 2 white in color plastic bags which were tied at the top. Each of the bags contained documentation and correspondence for 358 El Brillo and Jeffrey Epstein. All documents of evidentiary value were removed and turned over to Det. Recarey for follow-up.

On or about Wednesday October 5, 2005 at approximately 0928 hours, I

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responded to 358 El Brillo and met with PB Sanitation worker Jeff
Williams. I observed Williams enter the driveway of 358 El Brillo and
remove several plastic bags of trash and place the contents into the
bed of the sanitation truck.

I then followed Williams to a predetermined location and seized the trash from the truck. The trash was transported to the Palm Beach Police Department where I began sifting through its contents, with the assistance of Det. Recarey. There were a total of 2 bags, one of which was white in color and tied in a knot at the top, and the other was a black in color bag, which contained two white in color trash bags along with loose debris. Each of the bags contained documentation and correspondence for 358 El Brillo and Jeffrey Epstein. All documents of evidentiary value were removed and turned over to Det. Recarey for follow-up.

I met with Det. Krauel and requested further assistance to maintain trash collections at Epstein's residence at 358 El Brillo Road. On October 3, 2005, at approximately 10:30 am, I was contacted by Sgt. Frick to respond to the Palm Beach Police Station. Det. Krauel had observed Jeff Epstein riding his bicycle on South County Road. Upon my arrival, I met with Sgt Frick who advised, as Epstein was currently in Town; we interview as to her involvement with Epstein and the girls that are brought to his house. As we were to interview in the county, (outside of our jurisdiction), I contacted the State Attorney s Office Investigation Division, and made contact with Assistant Supervisor Investigator Carlos Ortiz. I requested assistance to interview as the interview may occur in the county. Supervisor Ortiz assigned Investigator Mike Waites to assist us at the location and interview of

Det. Dicks had responded to the address of and viewed her vehicle parked in the driveway.

baring was parked in the driveway of was parked in the driveway of awaited the arrival of Investigator Mike Waites. Upon his arrival, he was briefed that should she wish to be interviewed within her home he would be needed. However, should agree to return to the police station for further questioning, he would not be needed. Sgt. Frick and I knocked on the door and met with was told that we were investigating a claim involving Jeffrey Epstein of El Brillo in Palm Beach. was asked if she wanted to accompany us back to the police station for further questioning. She was also told that at the conclusion of the interview she would be returned home. She agreed and wished to change her clothes prior to accompanying us back to the police station. At the conclusion of her changing clothes, she advised she was ready to go. I thanked Inv. Waites and advised she was going to voluntarily return to the police station.

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ng the ride
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back to the p
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| | interview room
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she desire to
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entact with E
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d
she
v
ned |
| | She was told s \$200.00. Jeffrey. picked her up at the house, house. She was Epstein s bedr table with a s next to the ma Jeff would be towel. He lay for to to touch me an grabbed her bu Epstein has a told Epstein, stated she per massage, Epste know you re no He told her the oring a 23-yea old. stated and the | thought al (Unknown la and she was intro she was intro led upstairs oom. Sara an heet. She be sage bed. Sin a minute. on the table rub on him. d I stopped he tocks and she vibrator, whill massage formed the main paid to comfortable younger the rold female as asked how six that she wictim in this contact in the same as the same with the same as the same with the same as the same with the same with the same with the same with the same same same same same same same sam | bout the offer ast name) and taken to Epstoduced to Epstoduced to a whom to the main ranged the manught out the sara then left onto his stand the main. I asked the felt uncompleted by the sage naked. \$200.00 for the better. and Epstein many girls stand remember as case. | a massage and ser and agreed to (Unknown tein's house. It is tein in the kit it female known bedroom known tassage table and the bedroom womach and picket the room and to the bedroom womach and picket the and white in complete the massage. The massage are the massage are the massage. The massage are the massage are the massage are the massage are the massage. The massage are the massage. The massage are the mas | o meet with last name) Joon her arrive then of the wind to her as Jeft and laid them informed her wearing only a distance of the last stated, He transition of the last some gire once tried to the female was to tal to Epsted she brought | ied
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y girl she b
victim wante | girl she brough ld they would p ing. I asked h rought knew wha d to make money ut going to wor | t knew what to rovide a er if the victor to expect. She | tim |

Date: 7/25/06 PALM BEACH POLICE DEPARTMENT Page: 29
Time: 8:47:53 Incident Report Program: CMS301L Case No. . . : 1-05-000368 victim agreed and arrangements were made to bring the victim to

Epstein's house on a weekend.

(later identified as picked up the victim at the victim s house and entered through the kitchen door. They met with the house chef and Epstein s assistant Sara. The victim was introduced to Epstein while they were in the kitchen area. Sara led the victim upstairs and Epstein went upstairs. When the massage was over, the victim returned to the kitchen area. stated she was paid \$200.00 for bring the victim to Epstein's. stated the victim told her she was paid \$300.00 for the massage. Back in the vehicle, asked the victim what happened. The victim told her about the massage and then they went shopping. stated the victim was the last person she brought to Epstein. She further stated that she had changed her cellular number to avoid being contacted by Sara. She continued that when Epstein announces to his assistant that he is traveling to Palm Beach, Sara would contact to arrange girls for Epstein. Sarah, later identified as Sarah Kellen Date of Birth had told that Jeff likes to have his fun with the girls. stated that once her parents discovered that she was visiting Epstein, they disapproved of the encounters with him and she stopped. further stated that Sara still tries to call the house and leaves messages. With the assistance of we were able to identify DOB 1988, and DOB 19 Sgt Frick entered the room and explained that based on her own statements, she had implicated herself with bringing underage girls to Epstein's house. was aware of what she had stated and wished to assist further in hopes to receive a lesser charge. provided cellular telephone numbers for the girls she had mentioned previously. Additionally, she also provided possible addresses and areas in which they lived. As was being taken home in the vehicle, a tape recorder was placed within the vehicle to record any conversations within the vehicle. During the drive back to her home, made the comment I m like a Heidi Fliess. (Hollywood Madam who sent girls to clients for sexual favors in California). dropped off at her house without incident. Sgt Frick and I went to Speak with Loxahatchee, Florida in an attempt to speak with We met with S Mother) at the front door. We explained the ongoing investigation and felt that May have additional information as we had information that she had worked for Jeff. Mrs. introduced us to her husband and allowed us entry into the home. We sat in the dinning room and met with 1988. As she was under the age of eighteen, Mrs. was advised we would be speaking with her. She expressed, if her daughter had information she wanted to assist. As we interviewed she denied having any inappropriate encounters with Jeff (Epstein). She stated she had gone to Jeff s

Date: 7/25/06 PALM BEACH POLICE DEPARTMENT Page: 30 Time: 8:47:53 Incident Report Program: CMS301L Case No. . . : 1-05-000368 House with Haley Robson approximately eight months ago and sat in the kitchen with the house chef but nothing happened. As the parents were present during the interview, we felt that was withholding information from us. She made several comments as to she has put the entire incident behind her. I left my direct telephone number and advised should she wish to speak with me again to telephone me. Sgt Frick and I thanked Mrs. for her time and left the area. She stated she would ask her again after we left as to what happened at Epstein s house. I informed her that had my telephone number and hopefully she would call. Sqt Frick and I then attempted contact with who stated was her daughter. We met with was at the Wellington Mall and was not home. We explained the ongoing investigation and felt the way have additional information as we had information that she had worked for Jeff. We left our phone numbers and asked her to telephone me upon her daughter's return. We then left the area. On October 4, 2005, at approximately, 8:05 am, Sgt Frick had retrieved a voice mail message from She stated she had spoken with her daughter and she had information as to what occurred at Jeff s house. I contacted who stated her daughter was in the shower at the moment and would be traveling back to Orlando to attend College. I informed her I would be en route to her home in Det. Dawson and I drove to the home and met with and During a sworn taped statement, stated she was taken to the house by Haley Robson. She was told she could make money working for Jeff. She was told she would have to provide a massage to Jeff. stated upon her arrival to the house she was brought to the kitchen area by Robson. They met with the house chef and Haley stayed in the kitchen. She was introduced to Sara, Jeff's assistant and was brought upstairs to the mater bedroom. Sara prepared the room and massage table for a massage. Epstein entered the room and she provided a massage. stated she kept her clothes on during the massage. She stated sometime during the massage Epstein grabbed her buttocks and pulled her close to him. said she was wierded out by the incident involving Jeff. At the conclusion of the massage, she was paid \$200.00 for the massage. I asked if she has any formal training in massages to which she replied no. I asked her if Robson received any monies for taking her to perform the massage. also received money for taking her there.

Robson and another girl, stated she waited in the kitchen with Robson, while was taken upstairs by Sara.

Stated she waited in the kitchen with Robson, while was taken was wierded out by the whole experience. At the conclusion of the interview and the tape was stopped, I was informed that Sara had attempted to reach via cell phone. A voice mail message on October 4, 2005 at 10:59 am, revealed a female voice who identified herself as Sara who requested her to call her back reference the

On March 30, 2005, I was asked by Sgt. Daniel Szarszewski to begin conducting surveillance and trash pulls reference Detective Pagan conducting a criminal investigation involving Jeffrey Epstein. I was advised that Epstein was possibly engaging in sexual contact with young females.

On March 30, 2005, I made contact with Town of Palm Beach Sanitation Office Supervisor Tony Higgins and requested trash pulls for 358 El Brillo Way to begin on March 31, 2005.

On March 31, 2005 at 9:20 a.m., I responded to the area of 358 El Brillo Way and met with Town of Palm Beach sanitation employee, Jeffrey Williams. I observed Williams enter the driveway of 358 El Brillo Way, collect the trash bags from Epstein's property and place the contents into an empty sanitation truck. I followed Williams to a nearby area, were he turned over seventeen white plastic trash bags, which were collected from Epstein's property.

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On March 31, 2005, Sgt. Daniel Szarszewski requested that I set up a surveillance vehicle on El Brillo Way and conduct video surveillance of the front exterior of Epstein's residence. At 3:00 p.m., I set up a surveillance vehicle equipped with a video monitoring device. The surveillance vehicle was parked on El Brillo Way approximately fifty feet east of Epstein's driveway. The purpose of the video surveillance was to gather investigative intelligence by monitoring and recording all vehicle and pedestrian traffic entering and leaving Epstein's property.

The video surveillance tapes were changed daily with a new Maxell T-160 VHS tape. Video surveillance was established for Epstein s from March 31, 2005 through April 05, 2005. On April 05, 2005, video surveillance was concluded. I reviewed the video tapes and advised Detective Pagan the surveillance videos yielded no evidentiary value.

On April 01, 2005 at 9:30 a.m., I responded to the area of 358 El Brillo Way to meet with Town of Palm Beach sanitation employee, Jessie Jones. While parked in the area of 358 El Brillo Way waiting to collect Epstein s trash, I observed a white female, who I recognized as Nada Marcinkova from her Florida driver's license photograph. I made no contact with Marcinkova. While parked in the area, I also observed Epstein s GMC Yukon truck leave the property as well as other vehicles arrive and park across the street from the property. The occupants of these vehicles appeared to be housekeepers, maintenance men, and gardeners.

At 9:38 a.m., I met with Town of Palm Beach sanitation employee, Jessie Jones. I observed Jones enter the driveway of 358 El Brillo Way and collect the trash from Epstein s property. I followed Jessie to a predetermined area at which time I collected the trash bags from the sanitation truck. I transported the trash bags to the sanitation department, where I sifted through its contents. I collected mail correspondences addressed to Jeffrey Epstein, automotive records and personal documents for Janusz Banasiak and Beata Banasiak as well as Jeffrey Epstein notepaper with the names and appointment times for and written on the notepaper.

While sifting through Epstein s trash, I also collected a three-inch purple finger size object, which had a broken end. The object appeared to be a broke piece from a sexual toy similar to a (Cyclone Vibrator) possibly used for rectal gratification. The sexual object was photographed for Detective Pagan, packaged in a biohazard evidence bag (possible body fluids) and secured as investigative evidence. All items collected from Epstein s trash were turned over to Detective Pagan for evidentiary purposes.

On April 05, 2005 at 9:18 a.m., I met with Town of Palm Beach sanitation employee, Jessie Jones. I observed Jones enter the driveway of 358 El Brillo Way and collect the trash from Epstein s property. I followed Jessie to a predetermined area at which time I

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Case No. . . : 1-05-000368 (Continued) collected the trash bags from the sanitation truck. I transported the trash bags to the sanitation department, where I sifted through its contents. I collected mail correspondences addressed to Jeffrey Epstein as well as notepaper (Important Message) with names and telephone numbers. The following are items collected from Epstein s trash.

blank piece of white paper black paper black paper David MSN Hotmail web page with email address

The following items were documented for Detective Pagan s investigation for evidentiary purposes.

On April 06, 08, 11, 12, 13, 15, 2005, at approximately 9:30 a.m, I met with Town of Palm Beach sanitation employees. I observed the employee enter the driveway of 358 El Brillo Way and collect the trash from Epstein's property. I followed the employee to a predetermined area at which time I collected the trash bags from the sanitation truck. I transported the trash bags to the sanitation department, where I sifted through its contents.

All of the documents collected from Epstein's trash during my assistance were turned over to Detective Pagan for evidentiary purposes.

On June 14, 2005, Detective Michelle Pagan contacted me and advised that the airplane belonging to Jeffrey Epstein of 358 El Brillo Way was parked at the Palm Beach International Airport.

Detective Pagan requested that I begin trash pulls for the purpose of gathering evidence and intelligence.

I made contact with Town of Palm Beach Sanitation Office Supervisor Tony Higgins and requested trash pulls for 358 El Brillo Way to begin on June 15, 2005.

On June 15, 2005, I met with a sanitation employee. I observed the employee enter the driveway of 358 El Brillo Way and collect the trash from Epstein s property. I followed the employee to a predetermined area at which time I collected the trash bags from the sanitation truck. I transported the trash bags to the sanitation department, where I sifted through its contents. The trash yielded negative results and no evidence was collected.

No further trash was collected throughout the week due to the fact that Epstein s security gates remained closed throughout the week; therefore, the sanitation employees were unable to gain access onto the property for collection of the trash.

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Time: 8:47:53 Incident Report Program: CMS301L Case No. . . : 1-05-000368 All evidence and intelligence gathered by this officer has been turned over to the detective bureau and no further action has been taken by this officer. End of supplement. Reported By: RECAREY, JOSEPH 10/07/05 Entered By .: ALTOMARO, NICKIE A. 10/10/05 On October 4, 2005, I made telephone contact with who had left several messages on voice mail. During the message, she advised she was not completely truthful when we met in person but would like to speak with me to advise what had happened. She further advised she did not want to speak of this incident in front of her mother. At approximately 15:48 pm, I made telephone contact with at During a taped recorded statement, stated the following: Approximately a year ago, when she was sixteen years of age, Robson took her to Jeff's house twice. The first time she went, Haley Robson drove to the house. They entered through the kitchen area where she was introduced to Sara and Jeff. She was taken upstairs to a bedroom by Sara who set the room up with a massage bed and brought out the oils to use. Jeff then entered the room wearing a towel. He lay on the table and picked out a lotion for to rub on him. At one point during the massage, he tried to remove her shirt at which point she became very upset and discontinued the massage. Both and Jeffrey had a verbal disagreement at which time she left without being paid. She met with Haley Robson who was sitting in the kitchen and told her let's go.
advised she received no money for that day. said that Haley Robson had told her if she was uncomfortable with what was going on, to let him know and he'll stop. She knew that the more you do the more you are paid. Several weeks later, advised she agreed to be taken a second time by Haley Robson. Once they arrived at the residence, Haley sat in the kitchen and Sara took her upstairs to the master bedroom again. Sara set the room up with a massage bed and brought out the oils to use. Jeff then entered the room wearing a towel. He lay on the table and picked out a lotion for to rub on him. At one point during the massage, he tried to touch her buttocks. As wearing tight jeans and had a tight belt on Jeff was unable to touch her buttocks. Jeff then rolled onto his back during the massage; he attempted to touch her breasts. then became upset again and told him she didn't want to be touched. discontinued the massage and was paid \$200.00. then went downstairs where Haley Robson was waiting for her. She told Robson she wanted to leave. said she never returned to the house. stated she is aware that her friend, was also at the house and had a problem with Jeff. She provided a tolerhore number house and had a problem with Jeff. She provided a telephone number

Date: 7/25/06 Time: 8:47:53 PALM BEACH POLICE DEPARTMENT Program: CMS301L Incident Report Case No. . . : 1-05-000368 for The interview was concluded and the micro cassettes were turn in as evidence. On October 5. 2005. I researched the incoming telephone number that had left a message. The telephone number, was assigned to ATT/Cingular Cellular service. I prepared a subpoena request and faxed the request to the State Attorney s Office. Information requested was subscriber information as well as all incoming and outgoing calls for the months of September and October I later researched and discovered she resides in Royal Palm Beach. Det. Dawson and I drove to Royal Palm Beach and met with at her residence in Royal Palm Beach. agreed to speak with us in the kitchen area. During a sworn taped statement, stated the following: On or about November 2004, she was approached by Haley Robson and asked if she wanted to make money. She agreed and was told she would provide a massage to wealthy man in Palm Beach. Robson picked her up and drove her to a house in Palm Beach. She was brought into the kitchen area of the house. She further stated that and and went with them. They were brought into the kitchen where she was introduced to Jeff and other females. stated she was introduced to a helper of Jeff; the female was described as white female (unknown name), with blond hair. She stated that the assistant was familiar with Robson. The assistant set up the massage table and put out lotions to be used. She told Jeff would available in a minute. Jeff entered the room wearing only a towel. Jeff lay on the massage table and picked a lotion to rub on his thighs and back. further stated that during the massage Jeff asked her to remove her clothes. She complied and removed her pants and blouse. didn't remember if she had removed her bra but feels that she did. was certain that she stayed in her thong underwear. continued the massage and at one point she straddled him to massage his back, which touched his buttocks with hers. was instructed to return to the ground at which time Jeff turned to have his chest rubbed. Advised it was at this time she is sure he was masturbating. Industry and lid not want to look at his penis area because she was uncomfortable. Jeff removed a large white vibrator and turned it on. Stated he began rubbing the vibrator over her thong underwear on her vaginal area. Shortly thereafter, Jeff ejaculated and removed himself from the table. He walked over to where the shower was and opened the glass door. She waited as he was taking a shower in her direct view. When I asked how old she was when this occurred, she stated she had just turned seventeen. At the conclusion of the shower, was paid either \$350.00 or \$400.00. She stated she wasn't sure, but knows it was close to \$400.00. At the conclusion of the interview, stated she never returned to provide a massage for Jeff. She advised she was ashamed and uncomfortable with the situation. uncomfortable with the situation.

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       Det. Dawson and I then left the area and responded to the
       High School where Robson and all the above-mentioned girls had
       attended. I met with School Police Officer, Off Williams.
       explained I was looking for a previous student who attended
High School. I inquired about

I further explained
that I was working a case in which most of the girls I have
       interviewed are either witnesses or victims and felt that
       one as well. Officer Williams researched his previous student records
       and found She attended the same year and graduated
       in the same year as the other girls. I was provided the last known
       address of
       At approximatel v 2:10 pm. Det. Dawson and I met with
       her residence,
                                                             in Royal Palm Beach. As
       only seventeen years of age, I had notified her mother, Mrs.
         that she would be interviewed reference an ongoing
       investigation in Palm Beach. I assured her that her daughter was not
       a suspect. I explained the possibility of her being either a witness or victim. Mrs. advised she wanted to cooperate and consented to the interview. During a sworn taped statement,
        stated the following: at the age of sixteen, during the month of
       September 2004, she was approached by Haley Robson for a chance to
      make money. was friends with the friends of Robson and knew the same people. had been previously told by her friends what Robson did for Jeff. Robson called a person known to as Sara
      and scheduled the appointment. Robson picked up and drove her to Palm Beach to a street called Brillo Way. They drove to the end of the street and entered a large driveway. They entered the kitchen area of the house and met with Jeff.

Robson led Transparies to the main bedress and the street to Jeff.
      Robson led upstairs to the main bedroom area and set up the room
      with a massage table and set out the oils. Robson dimmed the lights
      and turned on soft music. Robson exited the room and Jeff entered the room wearing only a towel. Jeff picked oils and instructed her to rub
      his legs, under his buttocks, back and chest area. Jeff asked her to get comfortable. She
      was wearing tight jeans and a cropped tank top exposing her belly area. During the massage, Jeff removed his towel. As rubbed his chest area, Jeff attempted to reach down her pants through the
      buttocks area, however was unable to due to the tightness of the jeans and a tight belt.

advised Jeff began to masturbate as she rubbed his chest. She observed
      he was continuing to masturbate and attempted to reach up her tank top and touch her breasts. pulled back and Jeff stopped. However, he kept masturbating until he climaxed. He cleaned himself with the
      towel he was previously wearing. I asked if she knew the difference between circumcised and not circumcised. She explained she knew and advised Jeff was circumcised. was paid $200.00 for the
      massage and left the area. She met with Robson who was waiting in the
      kitchen area and left the house.
            then explained she never provided another massage for Jeff. She
      did however, go to the house with Robson and
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took another friend of Robson's.

went to work for Jeff. She advised she rode over and sat in the kitchen area with Robson to wait for that while they waited for them, as it was almost lunchtime. As was finished with the massage, they left the area. I asked if Robson ever told what would be expected of her when she provided a massage.

stated yes, Robson told her that a massage would be expected possibly naked and possibly some touching involved. (Continued) and possibly some touching involved. has no formal training in providing massages. poke about a third and last time she went to Jeff's house. Robson drove another girl, who is stated she knew that Robson had made money who is friend, to providing girls for Jeff and she wanted to do the same. Robson took them in the kitchen area of the house and introduced to Sara. Robson and Sara took upstairs to the main bedroom. advised she doesn t know what happened as did not speak about what happened in the room. Preceived \$100.00 from Robson for going with her to Jeff s house and recommending was unable to remember to stelephone number. The interview was concluded and we left the area. Investigation Continues... 10/09/05 10/10/05 On October 6, 2005, Det. Dawson and I went to Lynn University located in Boca Raton. We met with Dean of Students, Paul Turner. I explained to Mr. Turner that we were investigating a crime within the Town of Palm Beach and felt that a student, may have information. Turner confirmed that is a student and currently on the soccer team for Lynn University. She was in computer class at the time of our arrival. Turner sent a security guard to locate in class and bring her to the office. Mr. Turner allowed us to interview in an empty conference room. At 11:45 am I met with and explained to her why we there and explained to her why we there to interview her. She advised she was aware of the ongoing investigation. It is stated she had previously spoken with who told her she was interviewed by detectives. During a sworn taped statement, and stated she knew that Haley Robson worked for Jeff in Palm Beach. It advised she has been there many times for massages. It asked her if she had formal training in providing massages, stated she did not. It advised she was told what was expected of her by providing massages and would have to remove all others but if she felt uncomfortable just to say so and Jeff would clothing but if she felt uncomfortable just to say so and Jeff would stop pushing the issue. began providing massages and advised she kept her clothes on. She considered Jeff a pervert who kept

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pushing to go further and further.

telling him she had a boyfriend and that it would not be right to her boyfriend. It wasn t until recently admitted to removing her clothes and staying in her thong underwear to provide a massage.

Explained Jeff wanted to be rubbed on his back and recently he began turning over to have her rub his chest as he masturbated. He would try to touch her breasts as she rubbed his chest.

Jeff would try to get away with more and more on each massage.

Originally, Robson drove her to the house for the original massage.

Ieft Sara her cell phone number and every time Jeff would come into town, Sara would call her for an appointment. Each time she went, Sara would meet her at the kitchen door area. She would bring her upstairs and prepare the massage table.

Ask her questions about herself. He knew she was soccer player and would be attending Lynn University. I asked if he knew her real age, stated Jeff didn t care. The most recent massage she provided was on October 1, 2005. During the massage she asked Jeff if she could borrow one of his vehicles to visit her family and boyfriend in Orlando. Jeff had told she could borrow one of his vehicles but later stated he would rent her a car. She continued with the massage as Jeff grabbed her buttocks and caressed the buttocks cheeks. I asked if she was wearing undergarments to which she replied her thong underwear. Once he tried to touch her breasts she would pull away from him and he would stop.

Was aware of the vibrator but advised she never would allow him to use the vibrator on her. She described the vibrator as a large white vibrator with a huge head on the tip of the vibrator. She stated he kept the vibrator in a closet near the massage table.

Advised she had been doing the massage for approximately two years, which meant she would have started doing massages for Jeff at the age of sixteen.

stated she was contacted by Sara on October 3, 2005. Sara had informed her that Jeff had rented her a new Nissan Sentra and she should come by the house to pick it up. Sara informed she would have the car for a month. Stated Jeff knew her car was not working properly and had missed appointments in the past because of her car being inoperable. Explained the car is currently parked next to the Gym field. I asked her if she ever took any one to the house. Explained she took a friend of hers who has returned to Orlando to attend college. I asked she ever allowed another female in the room. Sadvised no one was brought into the room with her. At the conclusion of the interview, Det. Dawson and I went to the Gym area and located the Silver Nissan Sentra bearing Florida tag X98-APM. The vehicle is registered to Dollar rent a car out of the Palm Beach International Airport.

Telephone contact was made with the victim's mother, at I explained to her that I was following up on this case and provided a complete update on the case.

Investigation Continues.

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Traident Report Program: CMS301L Date: 7/25/06 Time: 8:47:53 Case No. . . : 1-05-000368 (Continued) Reported By: RECAREY, JOSEPH NA 10/21/05 Entered By.: ALTOMARO, NICKIE A. 10/21/05 a friend who also had previously gone to Epstein's house for massages.

advised she was working at the Wellington Mall when she was approached.

told her that she would have to provide a massage to Epstein and she would have to perform this massage naked. thought about the offer and stated she could make \$200.00 for only 30 minutes of work. She agreed to perform the massage and set the appointment for her that same day. remembered it was a weekend as she only worked at the mall on the weekends. took her to the house where she was introduced to Sara, Jeff Rostein assistant. Sara took her upstairs to a master bedroom. explained that as she was walking up the stairs she observed several photographs of naked women along the walls and tables of the house. further explained that she was brought into the bedroom where Sara prepared the room by setting up the massage table and provided the oils for her to rub on Epstein. Epstein entered the room and introduced himself. Epstein lay on the table and told her to get comfortable. could not remember if he was naked or if he entered the room with a towel. stated she provided the massage wearing only her panties. She continued rubbing his legs, thighs and feet. advised he turned over onto his back. She continued to rub his legs with the oils. Epstein touched her breasts and began to masturbate. I asked if she knew what circumcised and un-circumcised meant. stated circumcised is when the penis has no foreskin and the head of the penis is visible. said Epstein is circumcised. began to cry on the telephone and stated she had been to his house hundreds of times over a two-year period. She claimed to have made thousands of dollars during her period. She claimed to have made thousands of dollars during her visits. stated she could not remember how many times exactly she went to Epstein's home but said it was a lot. became more upset, crying hysterically and stated she was paid and instructed to have sex with Epstein's assistant, Nada Marcinkova by Epstein. Epstein continued to watch them have sex and masturbated himself as they had sex with each other. She further stated that things escalated further and further. Epstein used sexual toys such as vibrators, rubber penises and strap-on penises on Additionally, stated he performed oral sex on her numerous times. She claimed he (Epstein) put his fingers inside her vagina while he masturbated in an attempt to make her climax. could not continue and wanted some time to regain her composure. I explained to

take her time. After taking several minutes to regain her composure I

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Time: 8:47:53 Incident Report Program: CMS301L Case No. . . : 1-05-000368 (Continued) explained that I would travel to meet with her in person as I felt she had additional information to provide. I met with Sgt. Frick and explained the importance to meet with the n person. Sgt. Frick agreed and made arraignments for Det. Dawson and I to meet with in Jacksonville, Florida. On October 11. 2005, at 4:10 p.m., Det. Dawson and I met with and her friend, at present for support. I explained to her that I did not have a problem as long as she wanted present during the interview. Stated she wanted her present. I explained that as was present she was not allowed to comment or ask any questions during the interview. She was only there to comfort should the interview upset her. During a sworn taped statement, explained how everything began. She said she was brought through the kitchen area where she met Sara for the first time. She was led to the master bedroom, Epstein s room. explained that as she was walking up the stairs she observed several photographs of naked women along the walls and tables of the house. Further explained that she was brought into the bedroom, where Sara prepared the room by setting up the massage table and provided the oils for her to rub on Epstein. explained she remembered the steam room area, which contained two large showers. Epstein entered the room from the steam room area and introduced himself. Epstein lay on the table and told her to get comfortable. removed her skirt and kept her shirt on. She could not remember it he was naked or if he entered the room with a towel. Epstein then instructed her to remove her shirt. The removed her shirt and remembered she was not wearing a bra. The stated she provided the massage wearing only her panties. She continued rubbing his legs, thighs and feet. The advised he turned over onto his back. She continued to rub his legs with the oils. Epstein touched her breasts and began to masturbate. Epstein ejaculated which meant the massage. and began to masturbate. Epstein ejaculated which meant the massage was over. At the conclusion of the massage, the conclusion of the massage, where Sara and the were waiting.

They walked together downstairs where Sara and the were waiting. It stated to the conclusion of money for taking her to Epstein. Epstein instructed to leave her cellular telephone number so that he could contact her when he is in town. explained that she continued to go to Epstein s house and became a regular at the house. She could not provide an exact number but claimed she had been their hundreds of times. She claimed sexual activities did not occur every time she was there. There were times she went to dinners and parties with Epstein. explained that things began to escalate more than the massage. The encounters included bringing in his assistant, Nada Marcinkova. explained Epstein had purchased her from her family in Yugoslavia. Epstein bragged he brought her into the United States to be his Yugoslavian sex slave. Advised he was naked in the bedroom, she entered and removed her clothing. Marcinkova entered the room from the steam room area already naked. He instructed to perform oral sex on

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Marcinkova . refused to perform that act. Epstein offered her
an additional \$200.00 for her to perform oral sex on Marcinkova for
five minutes. agreed to perform the oral sex for the additional
\$200.00. explained that Epstein would masturbate while he
watched them perform sexual acts.

Things continued to escalate by purchasing sex toys. Stated she had massagers, vibrators and strap on rubber penises used on her. Each time something new was introduced additional monies were produced and offered for to allow the acts to happen. Was adament that she performs all these acts but there was an understanding with Epstein that no vaginal penetration would occur with his penis. explained that Epstein's penis was deformed. Explained that his penis was oval shaped. She claimed when Epstein's penis was erect, it was thick toward the bottom but was thin and small toward the head portion. She called it egg-shaped.

continued that the sexual encounters with Marcinkova, Epstein and her became a ritual. Would arrive at the house and walk herself upstairs, where Marcinkova and Epstein were waiting. Would remove her clothing and join them on the bed. Explained Marcinkova and she would begin by kissing and touching each other. Explained sex toys were brought into the bed by either Epstein or Marcinkova and they would begin using the toys on each other. Epstein would perform oral sex on either person depending who was on top during the intercourse. Explanation revealed they were in a missionary position.

advised one day, was unable to state and exact date when this incident occurred), she came to the house after Sara had informed her that Epstein had arrived. She arrived at the house and went upstairs to the master bedroom. Advised she immediately removed her clothing, as Nada Marcinkova and Epstein were already naked in the bedroom. Explained that Nada Marcinkova and she had a sexual encounter to include kissing, touching and oral sex. The remembered that she climaxed and was removing her self from the massage table.

Asked for a sheet of paper and drew the massage table in the master bathroom and where Epstein, Marcinkova and she were. Epstein turned for to her stomach on the massage bed and inserted his penis into her vagina. Stated Epstein began to pump his penis in her vagina. Stated Epstein began to pump his penis in her vagina. Stated Epstein began to pump his penis in her vagina. Stated Epstein began to pump his penis in her vagina. She said her head was being held against the bed forcibly, as he continued to pump inside her. She screamed no, and Epstein stopped. She told him that she did not want to have his penis inside of her. Epstein apologized for his actions and subsequently paid her a thousand dollars for that visit. Additionally, shortly thereafter, Epstein gave a 2005 Doge Neon, blue in color for her personal use.

advised there were times that she was so sore when she left Epstein's house. Advised she was ripped, torn, in her vagina area. Advised she had difficulty walking to the car after leaving the house because she was so sore.

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Time: 8:47:53 Incident Report Program: CMS301L Case No. . . : 1-05-000368 than that one time, when Epstein inserted his penis inside her vagina, there was no other penile intercourse. provided names of girls that she knew of that have gone to Epstein's house. Provided the name of and feels she still may be going to the house to massage Epstein. According to is still sucking his dick." When asked if she had been recently contacted by anyone of the house, advised she received an email from Sara, from het, which is her email account. The email was just a hello, how are you doing type of email. There had been no other contact from the house. The interview was concluded and left the area. The tapes and drawing were submitted into evidence. Investigation continues... ******* # 12 **************** N A R R A T I V E # 12 **************** NA Reported By: RECAREY, JOSEPH Entered By.: ALTOMARO, NICKIE A. Reported By: RECAREY, JOSEPH 11/01/05 11/07/05 On October 12, 2005, Det. Dawson and I traveled to the Orlando area

On October 12, 2005, Det. Dawson and I traveled to the Orlando area and made telephone contact with the agreed to meet with us as we were in the Orlando area. It is provided directions to her apartment. Det. Dawson and I met with the who stated, during a sworn taped statement that nothing happened between her and Epstein. It is appeared nervous during the interview. I assured her that I had spoken with other people who advised differently. It is stated she only went a couple of times and provided a massage to Epstein. She stated she was brought to the Epstein house in March of 2005.

She stated she was brought to the Epstein house in March of 2005.

She stated she was brought to the Epstein house in March of 2005.

Stated she was interviewed she provided a massage, fully clothed for \$200.00. As I sensed hesitancy in her answers, I asked if she had been contacted by anyone from the house.

Stated she was interviewed already by an investigator for Epstein. He met with her on October 8, 2005, at a Roadhouse in Orlando. He identified himself as Paul and inquired about the police investigation and left his telephone number for additional contact.

Sprovided no additional information, as it appeared her responses were almost scripted. We left the area and returned to Palm Beach Police Department.

Based on the information acquired during the interviews, a search warrant was prepared for entry at the Epstein home. On October 18, 2005, I met with Judge Laura Johnson who reviewed the warrant request. She found there was sufficient probable cause and signed the warrant request. On October 20, 2005, at approximately 9:36 am, members of the Palm Beach Police Investigations Unit executed the search warrant at 358 El Brillo in Palm Beach. Members of the Investigations Unit included Capt Gudger, Sgt Frick, Det. Dicks, Det. Dawson, Det. Melnichok, Det. Sandman, Det. Krauel, the crime scene unit and myself.

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(Continued)

As we entered onto the property, we encountered the house manager, Janusz Banasiak who was in the guest portion of the house. The guesthouse section had open doors and no forced entry was made. I made contact with Banasiak, Date of Birth Fl DL , and informed him of the search warrant for the premises. The members of the Police Department entered the residence and announced we had a search warrant. A safety search was done and members exited the home. I read the search warrant to Banasiak as Mgr Parkinson videotaped the search warrant execution. Several interior decorators were located on the property. I spoke with Mark Zeff, of New York. Mr. Zeff stated he is the designer for Mr. Epstein's homes. He advised he was contacted in March of 2005 to do a complete overhaul on the house. He advised he was on the phone with Mr. Epstein when officers announced the search warrant. Mr. Epstein was then made aware of the search warrant. Mr. Zeff advised, his contact with Epstein is strictly business and he has never witnessed Epstein with any girls except for his assistants, Sara or Nada.

I then interviewed Daniel Estes, of in New York. Mr. Estes stated he has worked for Zeff for seven years. He advised he personally worked on the New York and Palm Beach home for Mr. Epstein. He has previously met with Sara and Adrianna, Epstein's assistants in New York and in Florida. Estes stated they travel with Epstein everywhere he goes.

I interviewed Zara Bailey of New Jersey. Bailey stated she just arrived from Scotland and has worked with Zeff for only one month. She stated she has never met Epstein and has not seen him. The interview was then concluded.

I then spoke with Douglas Schoettle

City. Schoettle stated he has been Epstein's Architect for seven
years. He further stated he deals with Epstein's assistants and
speaks with Epstein on the phone. Schoettle stated he mainly speaks
with Sara Kellen, Epstein s main assistant, who travels with Epstein.
Schoettle stated he only has contact with Epstein when his services
are needed.

At approximately 10:30 am, I was informed that the videotaping was concluded. I entered the residence and located two covert (hidden) cameras. The first camera was a covert wall clock in the garage area. I traced the wire behind the clock and removed the RCA wire and unplugged the camera. The other covert camera was located within a desk clock beside Epstein's desk. I traced the wire behind the clock and unplugged the RCA wire. I could not locate another camera. I then began with the search of the residence for the specified evidence.

My search consisted of the second floor. Det. Krauel and I began in the master bedroom area where several items were located. They were

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marked to be retrieved by the evidence custodian. In the master desk

with Epstein's notepads marked Jeffrey Epstein we located a high school transcript from High School for Also in the room, was the dresser /armoire where we located a bottle of peach flavored Joy Jelly (Sexual Lubricant). Additionally, there were several photographs of young naked teenage girls within the closet, which was consistent with what the witnesses said. The massage table was also located within the master bedroom. Video tapes were located beside the television, which were also collected. An itemized list of the property and locations was prepared on the property receipts. At approximately 2:55 pm, the house was secured; the exit of the residence was videotaped. Upon our exit of the property, I encountered Atty. Guy Fronstein who advised he was representing Mr. Epstein. He provided a business card and provided his assistance with the investigation.

Due to Hurricane Wilma, which struck South Florida causing massive power outages, the courthouse was closed due to the lack of power. I was previously told that the Chief Judge had extended the filing deadlines due to the hurricane and the Courthouse being closed. October 27, and 28, 2005 the courthouse was closed and I could not file the search warrant and inventory at the clerk's office. On October 31, 2005, I responded to the courthouse and filed the paperwork along with an order to seal, signed by Judge Johnson, to deny any release of any paperwork on this case.

INV CONTINUES ..

NA Reported By: PARKINSON, GREGORY A. 10/20/05 Entered By.: ALTOMARO, NICKIE A. 11/07/05

On October 20, 2005, at approximately 8:30 a.m., Thursday morning, I was advised by Captain Gudger that a search warrant would be executed and that I was to assemble the Crime Scene Investigative Team and stand by the south side of the building ready to go. I designated Evidence Specialist Annette Badger to handle the inventory return, the documentation of the property receipts and the collection and bagging of the evidence at the scene. I further instructed CSI Kim Pavlik, ID # 8807, to accompany us and perform the role of photographing the scene and the items that may be taken into custody by the affiant, Detective Joseph Recarey, ID # 7915.

My responsibility was to go through from the reading of the warrant to the final exit from the residence and perform a video recording of the reading of the warrant, the initial walk through of the residence showing the current condition and then finally a walk through of the residence at the time of the police exit.

We started out towards the residence, which was located at 358 El Brillo and arrived at approximately 9:33 a.m. The search was conducted, items were collected by Evidence Specialists Badger,

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Case No. . . : 1-05-000368 (Continued) photographed by CSI Pavlik and then videotaped by myself. The search was concluded at approximately 3:05 p.m. whereupon Detective Recarey and I were the last two officers in the house. Upon securing the residence we met with the gentleman who identified himself to Detective Recarey as the lawyer for the defendant and he was informed that the residence was secured and that copies of the inventory return had been left on the first floor table of the personal assistant's office.

Detective Recarey and I returned to Police Headquarters and secured for the day.

On October 20, 2005, I assisted Defective Recarey in the execution of a search warrant at 358 El Brillo Way, Palm Beach, Florida, 33480.

Upon the announcement of the search warrant, immediate contact was made with three white males who came out of the house or surrounding structures. Those males were identified as Janusz Banasiak, Daniel Estes, and Mark Zeff. As other members of the police department cleared the home, I kept watch over these three males. Once the house was cleared, those males were turned over to Detective Recarey.

Detective Dicks and I were assigned to assist in the search of the main house, the cabana and the servant's quarters. We started in the garage. All areas of the garage were searched to include four vehicles. These vehicles were three black Mercedes Benz cars registered to Jeffrey Epstein. The fourth vehicle was a Harley Davidson motorcycle, green in color, registered to Jeffrey Epstein. Nothing was recovered from the garage.

A towel closet and pantry located off the kitchen were searched and yielded negative results.

The kitchen was searched and taken into evidence was a phone message book that was located near a house phone.

North of the kitchen was an office room which contained a computer. The room had a closet that contained a locked gun locker. The combination was entered by Banasiak in the presence of Sgt. Frick and the safe was opened. Items were taken from the room. See the completed property receipt for a detailed list.

A green bathroom located on the first floor was searched and nothing was taken.

A closet located just west of the green bathroom was searched. Two massage tables were located in the closet along with a photo of a nude

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Date: 7/25/06 PALM BEACH POLICE DEPARTMENT Page: 47
Time: 8:47:53 Incident Report Program: CMS301L Case No. . . : 1-05-000368 introduced himself as Jeff. advised she recalled she and removed their clothing down to their panties, Epstein lay on his stomach area and they provided a massage on his legs and feet area. I asked if she had any formal massage training and she replied no. advised she was topless and the panties she wore were the boy shorts lace panties. She and continued the massage until the last ten minutes of the massage, Epstein, told to leave the room so that could finish the massage. got dressed and Epstein turned over onto his back. Epstein then removed the towel, which had been around his waist. Epstein laid there naked and requested that rub his chest area.

stated as she did this, Epstein, began masturbating as she rubbed his chest.

stated he pulled down her boy short panties and he produced a large white vibrator with a large head. She stated it was within a drawer in his master bathroom. He rubbed the vibrator on her vagina area. advised he never penetrated her vagina with the vibrator. He continued to rub her vagina with the vibrator as he continued to masturbate. Stated she was very uncomfortable during the incident but knew it was almost over. Epstein climaxed and started to remove himself from the table. He wiped himself with the towel he had on previously and went into the shower area got dressed and met with in the kitchen area. Epstein came into the kitchen and provided 200.00 for bringing and paid \$200.00 to for providing the massage. Was told to leave her telephone number with Sarah, his assistant for future contact. Provided her cellular telephone number for future contact. Was asked if she was recently contacted about this investigation by anyone from the Epstein organization. She replied she was called but it was for work. She stated she was called by Sarah for her to return to work work. She stated she was called by Sarah for her to return to work for Epstein. Stated work is the term used by Sarah to provide the massage in underwear. advised she declined, as she was not comfortable in providing that type of work. The interview was concluded and the videotape was placed into evidence. Investigation Continues... NA. Reported By: RECAREY, JOSEPH Entered By: ALTOMARO, NICKIE A. 11/10/05 11/10/05 On November 7, 2005, I made telephone contact with advised she would be able to meet with me at her home. Det. Sandman and I traveled to her home in Royal Palm Beach and made contact with During a sworn taped statement, stated she met Jeffrey Epstein through Haley Robson. Robson would approach females who wished to work for him. stated she was asked to work for him but declined. explained that work means give massages. She was asked about any formal training in providing massages to which she said no. said she accompanied Robson and other females

Date: 7/25/06 PALM BEACH POLICE DEPARTMENT Page: 48
Time: 8:47:53 Incident Report Program: CMS301L Case No. . . . : 1-05-000368 who were taken to Epstein s house to provide massages. further stated she had been to the house approximately 4 or 5 times in the past year. She accompanied Robson with the 14-year-old victim, and Each time the girls were taken over, they were previously told they would have to provide a massage, possibly naked. It was also told that should Epstein require them to do anything extra and they were not comfortable just to tell him and he would stop.

Robson received \$200.00 for each girl she brought over to massage Jeffrey Epstein. When I asked which girl appeared to be the youngest, she replied, the victim, as she stated she was fifteen years old at the most; she looked really young. she went to the house, she sat in the kitchen and waited with Robson until the massage was over. She further stated that the cook would make lunch or a snack for them as they waited. I asked her if there was anything that caught her attention within the home. stated there were a lot of naked girls in photographs throughout the house. The interview was concluded and the tape was turned into evidence. Investigation Continues.. ************************** N A R R A T I V E # 17 **************** NΔ Reported By: RECAREY, JOSEPH Entered By: ALTOMARO, NICKIE A. Reported By: RECAREY, JOSEPH 11/10/05 11/10/05 Det. Dawson and I attempted contact with Beach. I left my business card at her front door. Ms returned my call and arranged a meeting with me at the Palm Beach Police Department for November 8, 2005. At approximately 2:00pm, arrived at the Palm Beach Police Department. She was brought into the interview room and the door was closed for privacy. She was told that I appreciated her coming to the police station for questioning regarding an on going investigation. She was told that I was investigating a crime involving Jeffrey Epstein and knew, based on the investigation, that she had encounters with him in the past.

During a sworn taped statement, stated she had met Epstein approximately two years ago. She was first introduced to Epstein by Haley Robson. Robson approached her about working for Epstein and providing a massage to him for \$200.00. The arrangements were made and as Robson could not take her the day the arrangements were made, took also attended School and was familiar with Epstein. recalled she was brought there and entered through the back kitchen door. She had met with an assistant Sarah and another assistant Adrianna. Sarah brought her upstairs as she observed several photographs of naked females throughout the house. stated Epstein came in the room, wearing only a towel, and laid on the table. Stated he picked out the oils he wanted her to use and requested she remove her clothing to provide the massage. stated that on the first massage she provided she did not remove her

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Time: 8:47:53 Incident Report Program: CMS301L Case No. . . : 1-05-000368 clothing. stated she had returned several times after that. Each time she returned more things happened. stated that the same thing would happen. Epstein would walk into the master bedroom/bathroom area wearing only a towel. He would masturbate as she provided a massage. Stated she was unsure if he climaxed as he masturbated under the towel. Additionally she never looked blow his waist. She claimed that Epstein would convince her to remove her clothes. She eventually removed her clothes and stayed in her thong panties. On occasion, Epstein would use a massager/vibrator, which she described as white in color with a large head on her. Every time she provided a massage he would masturbate.

she provided a massage he would masturbate.

formal training in providing a massage.

two females during her visits to provide massages.

brought a girl named and from high School.

Stated she received \$200.00 for each girl she brought. Additionally, was given \$200.00 for taking her in the year hegipning. The interview was concluded and the tape was placed

Investigation continues...

into evidence.

*************************** N A R R A T I V E # 18 ****************** NAReported By: RECAREY, JOSEPH 11/13/05 Entered By.: ALTOMARO, NICKIE A. 11/14/05

very beginning. The interview was concluded and the tape was placed

On November 8, 2005, I made telephone contact with .987, at her residence. responded to the police station for an interview reference an ongoing investigation. At approximately 2:30 pm, she arrived at the Palm Beach Police Station and was brought 2:30 pm, she arrived at the Palm Beach Police Station and was brought into the interview room for the interview. The door was closed for privacy and she was told that I appreciated her cooperation in this case. During a sworn taped statement, stated she had met Jeffrey Epstein approximately one year ago. She was approached by a subject known to her as subject known to her as to make money providing massages to Epstein. The had heard that several girls from thigh School were doing this and making money. She agreed and was taken to the house by the distributed her to Sarah and Epstein and brought her upstairs to a had introduced her to Sarah and Epstein and brought her upstairs to a master bedroom and Master bathroom where a massage table was prepared and the proper oils were taken out. Left the room and waited downstairs for stated Epstein entered the room wearing a towel and she provided a massage wearing only her thong panties.

Advised Epstein had masturbated every time she provided a massage. She stated Epstein continued to masturbate until he climaxed; once that occurred the massage was over. She felt the whole situation was weird but she advised she was paid \$200.00 for providing the massage. She also stated received \$200.00 for bring to Epstein.

stated she had gone a total of 15 times to his residence to ovide a massage and things had escalated from just providing a

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massage. Epstein began touching her on her buttocks and grabbed her closer to him as he masturbated. Epstein also grabbed her breasts and fondled her breast with his hands as she provided the massage. stated on one occasion, he offered extra monies to have vaginal intercourse. She stated this all occurred on the massage table. stated Epstein penetrated her vagina with his penis and began having intercourse with her until he reached the point of climax. Epstein removed his penis from her vagina and climaxed onto the massage table. received \$350.00 for her massage. I asked her if she had any formal training in providing massages, stated she did not.

continued to state on one other occasion, Epstein introduced his assistant, Nada, into the massage. Nada was brought into room with to provide a massage. Epstein had them kiss and fondle each other around the breasts and buttocks as they provided a massage to Epstein. Epstein, watched and masturbated as this occurred. On other occasions, Epstein introduced the large white vibrator/massager during the massage. Epstein stroked the vibrator/massager on vagina as she provided the massage.

stated the last time she spoke with anyone at the house was with Sarah during the weekend of October 2 or 3, 2005. Stated she had brought two people to the Epstein house. She provided the names of and (unknown last name). It should noted had been previously identified as been previously interviewed. The interview was concluded and the videotape was placed into evidence via the locker system.

On November 9, 2005, Sgt Frick and I traveled to in Boynton Beach, Florida in hopes to interview Juan Alessi, the former houseman of Epstein's home. As no one was home, a business card was left for him to return my call. We then traveled to in Miami in hopes to interview Alfredo Rodriguez, a former house man of Epstein. We did not locate them at home. I left a business card for him to return my call.

We then traveled to Lynn University and met with Dean of Students, Mr. Turner. We requested to speak with was re interviewed, as she still was in possession of the rental car that Epstein had acquired for her. stated that Sarah, Epstein's assistant, had called her on her cellular telephone and informed her that rental was extended for her. Sarah stated she had paid an additional \$625.00 for her to keep the rental an extra month. was asked if she had any additional contact with either Epstein or anyone from his organization. Stated she did not, other than the telephone call informing her that she could keep the car for an extra month.

On November 10, 2005, at approximately 9:47 am, Alfredo Rodriguez had telephoned reference my business card found on his door. Rodriguez stated he had worked with Epstein for approximately six months after

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the previous houseman left. Rodriguez stated that it was his responsibility to keep the identity of the masseuses private. Mr. Epstein had a massage in the morning and one in the afternoon. Mr. Rodriguez stated he would rather speak about this in private. He advised he would come to the police station to speak with me. Rodriguez stated he would return my call on Monday, November 14, 2005.

I then made telephone contact with Juan Alessi. He advised he found my card on his door and wanted to know what I needed to speak with him about. I explained to Alessi that I was conducting an investigation on his former employer, Mr. Epstein. Alessi stated he would return my call shortly as he was in the middle of a project at his home. I received a telephone call from Attorney Donald Morrell from Mr. Morrell stated he represented Mr. Alessi and did not want me speaking with his client. I then made telephone contact with the State Attorney s Office and confirmed that subpoenas would be issued to the former employees to assist in the investigation.

I then made telephone contact with Attorney Guy Fronstin, attorney for Mr. Epstein. I explained to Mr. Fronstin that I would like to speak with Mr. Epstein. He stated Mr. Epstein is not in residence in Florida at this time and would check with him to ascertain if he could be here by Wednesday November 16, 2005 for an interview. Mr. Fronstin stated he would return my call should Mr. Epstein decide to come in to the police station for an interview.

Investigation continues.

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| | | Ent | eı | rec | 1 1 | Зу. | : | ΑI | TC | MA | RO | , N. | ICK | Œ | E A. | | 11/16/05 |

On November 14, 2005, Det. Sandman and I traveled to

in Loxahatchee, Florida and spoke with

told of the ongoing investigation involving Epstein.

she had gone to the house on several occasions. During a sworn taped statement, she advised she started going to the house approximately one year ago and was brought by

stated brought her into the house and she was introduced to a girl named Sarah. Once she met her. Sarah brought her upstairs into a master bedroom bathroom.

stated she met Jeffrey in the bathroom. He lay on the table and picked the massage oils. She provided the massage, as he lay naked on the massage bed. She stated she rubbed his calves and back area. Upon the end of the massage, Epstein removed himself from the massage table and paid her \$300.00 for the massage.

stated she had only been at the house approximately five or six times.

Said each time she went to the house she was notified by Sarah, Epstein's assistant, that Epstein was in town and would like her to work.

Stated she returned to the house and was again led upstairs by Sarah. She provided the massage, clothed.

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advised it wasn't really weird until later on. asked if she ever removed her clothing to provide a massage. stated it was not until the third time she went that she removed ner clothing. stated she was notified by Sarah that Epstein wanted her to come to work. She arrived at the house and was led upstairs by Sarah. She started providing the massage when Epstein asked her to remove her clothing. The removed her pants, shirt and bra. She stayed in her thong pantles and continued rubbing Epstein. Epstein turned over onto his back and she rubbed his chest area. Stated she know he was masturbating himself as she providing the massage. Stated she believed he climaxed based on his breathing. She did not want to miew either the climax or the fact that he was masturbating. relaxed he got up and told her to get dressed. She was paid \$300.00 for her services. stated on the last time she went to provide a massage, she was notified by Sarah to come to the house and work. Stated she was now dating her current boyfriend and did not feel comfortable going. She recalled it was approximately January 2005. She said she went, already thinking that this would be the last time. She went upstairs and went into the master bathroom. She met with Epstein, who was wearing only a towel as he entered the room to lie on the table. stated Epstein caught her looking at the clock on several occasions. Epstein asked her if she was in a hurry. stated her boyfriend was in the car waiting for her. stated that Epstein got upset, as she wasn't enjoying the massage. She told him that she didn't want to continue and she would not be back. Epstein told her to leave as she was ruining his massage. I asked her if she had any contact with Epstein's organization, she stated she received \$200.00 from Western Union in Royal Palm Beach and Okeechobee Blvd as a Christmas gift. advised she had no formal training in provide any massages. also stated she was sixteen years old when she first went to Epstein's house. At approximately 4:22 pm, I made telephone contact with at She agreed to meet with me at a public place. I suggested she come to the police station for an interview. not want to meet at the police station. I recommended we meet at the Palm Beach Gardens Mall in the food court area. She agreed and an appointment was made for November 15, 2005 at 5:00 pm at the food court. Investigations Continue. Reported By: SANDMAN, JENNIFER R. 11/16/05 NA

On 10/20/2005, I assisted executing a search warrant at 358 El Brillo Way in the Town of Palm Beach, Palm Beach County Florida under the direction of affiant Detective Joe Recarey.

Entered By.: ALTOMARO, NICKIE A.

11/17/05

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(Continued)

Detective Melnichok and I searched the pantry room that is west next to the kitchen. This room had all white cabinets with a dark grey and black counter top. We did not find anything in this room.

We searched the yellow and blue room that is west next to the pantry room. This room had a very large statue of man with a bow. Taken into evidence from this room were nine photographs in frames of various women.

We searched the main entrance foyer that is to the north of the yellow and blue room. This room contained two bamboo chairs and ottomans with cushions. It also contained a round table with numerous books.

We searched another blue room that is west of the foyer. This room had a stereo system and book shelves that were from the floor to the ceiling. Taken into evidence from this room were eight photographs in frames of various women and/or Epstein, the owner of the residence.

We searched the room to the west of the blue room that has sliding glass doors that lead out to the pool. In this room in a dresser were two DVD's and two VCR tapes. These items were taken into evidence.

We searched a 2004 black Chevy Suburban bearing Florida tag
X99-EGL, registered to Jeffrey Epstein DOB
on the east side of the driveway facing south. I found a Thrifty
rental agreement between the passenger seat and the middle console.

The name on the rental agreement was Johanna Sjoberg from

The phone number on the

rented was a white The vehicle was rented on 9/25/05 at 17:58 hours and was returned on 9/26/05 at 16:52 hours. The last four numbers of the credit card used are Detective Melnichok found a piece of paper in the middle console that said I used the cash in here to fill up the tank and was signed by Johanna.

I searched the 2005 black Cadillac Escalade ESV bearing Florida tag Q29-9GT, registered to Jeffrey Epstein dob which was located on the west side of the driveway facing south. I did not find anything in this vehicle.

All of the items that were taken into evidence were photographed in the place they were located and then turned over to crime scene.

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| Case | No | : 1-05-000368 | э | 1 | (Continu | led) |
| | in R seventeen- cold from speak with subject sh her, I exp needed to telephoned explained | er 15, 2005, Det. coyal Palm Beach. year old juvenil which she was su her in reference would know as lained that because with her palather, Mr. to him that Det. th Mr. ith his daughter advised he had | We met with e who was not 1 ffering. e to an ongoing Jeffrey Epstein use of the fact arents prior to Sandman and T | m school this was told to livestigation rior to specified that she is a speaking with on his cell p were there to e and informed o an ongoing i | peaking with a minor, I her. She whone and speak with her in the him I neede investigation | er |
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Tracident Report Program: CMS301L Date: 7/25/06 Time: 8:47:53 Fime: 8:47:53 Incident Report Case No. . . : 1-05-000368 respond to any other questions. When I asked her what happened at the house, stated everything happened. It all began with the massages. Each time she went more things happened. She would massage Epstein and he would masturbate and climax. She stated things escalated from there. She provided oral sex on Epstein and he provided oral sex on her. She stated he would also use a massager/vibrator on her vagina to stimulate her as she massaged him. He introduced his assistant Nadia or Nada to have vaginal intercourse with _____. She stated Nada or Nadia would utilize a strap-on (synthetic penis) to have intercourse with her. She was told to masturbate herself as Epstein and Nada had sexual intercourse. All this was done at Epstein's direction. could not provide exact dates as she had been to the house so many times. stated Epstein inserted his fingers in her vagina to stimulate her as she massaged him. When I asked her if there had been any vaginal intercourse with Epstein, she stated she did not have sex with him. She did admit having sex with Nada, his assistant. stated not every time she went involved sexual favors. Sometimes she would just talk with him and get paid. I asked her how much she was paid each time she went to Epstein's residence. stated she got paid \$300.00 every time she went to the house. She was told to bring other girls to him to provide massages. stating that she does what she does and did not want to introduce anyone else to do what she does. Stated she had never received any formal training in providing massages. a photo line up in which Nada Marcinkova was placed in position six. She reviewed the six photographs and immediately identified Nada Marcinkova as the person with whom she had intercourse. Additionally, it was the same person she watched have intercourse with Epstein. She signed the photo line-up under Nada Marcinkova s photo as the person she identified. We then left the mall and returned to the police station. The photo line up and tape were placed in to evidence. Investigation Continues... NAReported By: RECAREY, JOSEPH 11/29/05 Entered By .: ALTOMARO, NICKIE A. 12/01/05

On November 17, 2005, I received a phone message from Atty. Guy Fronstin who advised to call his cellular phone reference his client Jeffrey Epstein. I telephoned his cell phone and left a message for him to return my call. I did not receive a call back on Thursday, November 17, 2005. On Friday, November 18 2005, I retrieved another voice mail from my work phone from Mr. Fronstin advising he would not produce his client Jeffrey Epstein for any statement. Fronstin stated he had spoken with ASA Lana Belohlavek and expressed Mr. Epstein has a passion for massages. I called ASA Lana Belohlavek and confirmed that

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Fronstin had telephoned her reference this case. Although nothing was discussed, Mr. Fronstin did advise her that Epstein is very passionate about massages.

I also spoke with ASA Daliah Weiss reference the previous employees, Juan and Maria Alessi. She advised that they had been served through a subpoena process server. They were both scheduled to appear on Monday November 21, 2005 at 12:00 p.m.

On November 21, 2005, I met with ASA Weiss, Atty. Donnie Murrell and Juan and Maria Alessi at the State Attorney Office. ASA Weiss had requested a court reporter to be present to take the statement of the Alessi s. I spoke with Maria Alessi, in the presence of her attorney, Donnie Murrell. She advised she had worked for Epstein for eight years, from the period of 1994 through 2002. She advised she had never had any direct conversations with him. She stated it was her husband who spoke directly with Epstein. Her work consisted of doing house cleaning, shopping and other preparations when Epstein would arrive in town. Alessi stated the preparations consisted of preparing the house and bathrooms for his arrival. She advised she did view several masseuses that arrived at the house. She advised that two or three girls would come during a day and provide the massages. The girls that arrived looked young in age. Mrs. Alessi did not know any of the girls personally and were always different. She was told that when Epstein was in residence he did not want to encounter the Alessis during his stay in Palm Beach.

I then spoke with Mr. Alessi in the presence of his attorney, Donnie Murrell. Mr. Alessi stated that he was employed for eleven years with Mr. Epstein. He originally was hired as a part time employee and then moved up into a full time position. His duties included everything. Alessi stated he was the house manager, driver and house maintenance person. It was his responsibility to prepare the house for Epstein s arrival. When asked about cooks or assistants, Alessi stated they traveled with Epstein on his private plane. He remembered dealing with his girlfriend, Ms. Maxwell originally and then dealt with Epstein directly.

I asked Mr. Alessi about massages that occurred within the home. Mr. Alessi stated Mr. Epstein had up to three massages a day. Each masseuse that visited the house was different. Alessi stated that towards the end of his employment, the masseuses were younger and younger. When asked how young, Mr. Alessi stated they appeared to be sixteen or seventeen years of age at the most. The massages would occur in Epstein's bedroom or bathroom. There were times he recalled that he would set up the massage tables either in Epstein's bedroom or in his bathroom. I asked if there were things going on other than a massage. Alessi stated that there were times towards the end of his employment that he would have to wash off a massager/vibrator and a long rubber penis, which were in the sink after the massage. Additionally, he stated the bed would almost always have to be made after the massage. Alessi was never privy to what went on during the

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(Continued)

He was asked if he remembered any names of the girls that massaged Epstein. He tried to remember and was unable to provide any exact names of any girls. Alessi was asked about any contact with anyone from the Epstein organization. Alessi said he did speak with Mr. Epstein shortly after my initial contact with him to find out what was going on. Alessi also stated that approximately on November 11, 2005, he was contacted by a private investigator from the Law Office of Roy Black. The investigator had called him to meet with him to ascertain what he was going to tell the police. Alessi stated they met at the Carrabba s Restaurant in Boynton Beach and discussed the same questions I was asking him. I informed Mr. Alessi and Mr. Morrell that as this is an ongoing investigation and anything we discuss should be confidential. They both acknowledged the fact that the information would be kept confidential. It should be noted that a court reporter was present during the interviews and would be providing a copy of the statements to me when they become available.

On November 21, 2005, I received a voice mail from Mr. Fronstin who advised he would not be making Mr. Epstein available for any statements. He did have some words that he wanted to relay on behalf of Mr. Epstein. I telephoned his office and left a message for him to return my call.

On November 29, 2005, I received a call back from Mr. Fronstin who left a voice mail after hours on November 28, 2005, advising he would return my call during normal business hours to speak with me reference the case on November 29, 2005.

NA Reported By: RECAREY, JOSEPH 11/29/05 Entered By .: ALTOMARO, NICKIE A. 12/01/05

On November 29, 2005, at approximately 2:30 p.m. I received a telephone call on the department issued cell phone. Mr. Fronstin stated he was calling to relay information that Mr. Epstein wished he could relay. Mr. Fronstin stated that he would not allow Mr. Epstein to speak with me at this time. He further stated that Mr. Epstein is very passionate about massages. He continued that Mr. Epstein had allegedly donated over \$100,000 to the Ballet of Florida for massages. The massages are therapeutic and spiritually sound for him that is why he has had many massages. Mr. Fronstin stated he appreciated the way the investigation has not been leaked out into the media. I explained to Mr. Fronstin that it is as important to protect the innocent if the allegations are not substantiated. Mr. Fronstin was told of the allegations that the private investigators assigned to the case have been portraying themselves as police officers. Additionally, I explained that my cell phone had been called by the private investigators. Mr. Fronstin advised he was not aware of that and advised they were under the direction of Attorney Roy Black in

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Time: 8:47:53 Incident Report Program: CMS301L Case No. . . : 1-05-000368 Miami. Mr. Fronstin further stated Epstein had originally called Mr. Dershorwitz in Boston, who recommended Roy Black in Miami, who asked Mr. Fronstin to assist. I informed him that if and when any charges would be presented I would notify him. The call was then terminated. Investigation continues. A review of the telephone message books, which were obtained during the search warrant, was conducted in which various messages from different dates were made to Jeffrey Epstein. The telephone message books have a duplicate copy (Carbon Copy) which, once a phone message is written into the book, the top copy is then torn on the perforated edge and the carbon copy is left in the book. First names of girls, dates and telephone numbers were on the copy of the messages. recognized various numbers and names of girls that had already been interviewed. The body of the messages was time of the day that they called for confirmation of "work." Other names and telephone numbers were located in which the body of the messages were, "I have girls for him" or "I have 2 girls for him." These messages were taken by Sarah for Jeffrey Epstein. Based on the context of the body of the messages, I requested subpoenas for subscriber information on the telephone numbers and the time frame involved. Copies of the messages were made for evidentiary purposes. I obtained 1 High School yearbooks for 2005, 2004 and 2003. I first reviewed the 2005 yearbook and located most of the girls I had spoken with. Additionally, I located
Based on the corrected name spelling, I was able to locate her to her residence in Loxahatchee. On December 8, 2005, Det Caristo and 1 responded to Loxahatchee. I located at her home. She advised she is attending High and is participating in the early release program so she can maintain her part time job. As she is still a minor, I left my business card to have her mother return my call to request an interview with her daughter. We then left the area. I also had previously researched the telephone number for telephone number A subpoena had been issued for the The telephone number was registered to information on that she is the daughter of hand is currently residing at
West Palm Beach. Det. Caristo and I attempted contact with with negative results. I left my business card on her front door requesting she return my call. We then responded to
I also attempted contact wi I also attempted contact with with negative results. I left my business card for him to

return my call.

Date: 7/25/06 PALM BEACH POLICE DEPARTMENT Page: 60 Time: 8:47:53 Incident Report Program: CMS301L Case No. . . : 1-05-000368 (Continued) On December 9, 2005, I received a telephone call from s mother, who was made aware of the on going investigation in Palm Beach. advised she was told of everything that occurred at Epstein's house involving Epstein and his staff. She advised she would allow me to question her daughter about what occurred and would cooperate with the investigation.

provided me with seems cellular telephone number to schedule an appointment for an official interview. I telephoned her cellular telephone and made a tentative appointment for Monday, December 12, 2005. , father of I then received a telephone call from who stated he found the business card on his door. I explained that I was conducting an investigation and needed to speak with as she may have information that could assist in the investigation. Mr. stated that his daughter no longer resides with him and has her own trailer in another trailer park. He advised he would tell her to call me. On December 12, 2005, due to a conflict with schedules, arrangements were made to meet with on Tuesday, December 13, 2005 at 5:00 pm. On December 13, 2005, Det. Dawson and I traveled to Loxahatchee and met with stated that when she was sixteen years old, she was taken to Epstein's house to provide a massage for money stated it was before Christmas last year when her and asked if she needed to make money for Christmas; stated she did and agreed to provide a massage for money. I made arrangements to take to the house and drove to the house to "work." stated she could not remember the street name but would be able to drive to the street. They drove to the last house on the street and pulled in the last house on left side. They walked up the street and pulled in the last house on left side. They walked up the driveway and entered through a side gate which led to a kitchen door. They knocked on the door and were encountered by an employee who described as a "Spanish looking lady." They informed her that they were expected. They were then encountered by a white female with long blond hair. was unable to remember the name of the white female with blond hair but knew she was Epstein's assistant. She was led upstairs by the white female who explained that there would be lotions out already and Epstein would choose the lotion he wanted her to use. She was led through a spiral staircase which led to a master bedroom and bathroom. The massage table was already set up in the bathroom. described the bathroom as a large spacious bathroom with a steam room and shower beside it with a sink to the right. was introduced to Jeff who was on the phone when she entered Jeff was wearing a white towel and lay on his stomach so that may massage his feet and calves. massage with the massage oil Jeff chose and rubbed his feet and calves. Jeff got off the phone and requested she massage his back as well. began rubbing his back and got to the small of his back. During the rubbing of his back Jeff asked her to get comfortable. He

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requested she remove her pants and shirt.

and pulled her pants off.

As she finished the small or the back, Jeff then turned onto his back. He instructed she rub his chest and pinch his nipples. As she began to rub his chest, Jeff asked her questions about herself.

remembered telling him she attended

School. Jeff asked her if she was sexually active. Before could answer, he also asked what sexual positions does she enjoy.

stated she was shy didn't like talking about those things. She continued rubbing his chest. Epstein reached up and unsnapped her bra from the front.

Explained the bra she used had a front snapping device. Epstein rubbed her breasts and asked her if she like having her breasts rubbed.

Epstein then removed his towel and lay on the bed naked exposing his penis to the began touching his penis and masturbated as he touched her breasts.

Explained Jeff then touched her vagina area by rubbing her vagina with his fingers on the outside of her thong panties.

Was uncomfortable.

stated that Jeff told her , "Relax, I'm not going inside." She rurther explained Jeff commented to her how beautiful and sexy she was. Jeff then moved her thong panties to one side and now was stroking her clitoris. Said "Jeff commented how hard my clit was." He then inserted two fingers in her vagina and was stroking her within her vagina. She tried pulling back to pull out his fingers from within her vagina. Jeff removed his fingers from within her vagina and apologized for putting his fingers inside her. During this time he kept his hand on her vagina area rubbing her vagina. Stated he rubbed her real hard as he was masturbating. Said he climaxed onto the towel he had been previously wearing and got up from the table. Jeff told her there was \$200.00 dollars for her on the dresser within the master bathroom. Jeff also told her that there was an additional \$100.00 that was to be given to for bringing her there to massage him. Jeff told her to leave her telephone number with his assistant as he wanted to see her again. Jeff stated his assistant would contact her to work again soon.

I asked her if she ever received any formal massage training to which stated she did not. Stated it was the only time she ever went to work for Jeff and knew what happened to her was wrong. She stated she no longer speaks to because she was upset that took her there. She further stated that she had never been contacted for any additional work. The interview was terminated and we left the area.

Investigation Continues...

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On 102005 at approx 0930hrs I assisted with the execution of a search warrant at 358 El Brillo Ave, Palm Beach.

Initially I was assigned to enter the residence and conduct a sweep of the premises for safety purposes. I then accompanied CSEU tech Pavlik while she photographed the exterior of the house. Once this was complete I was assigned to search certain areas of the house with Det. Dawson as part of the search warrant.

We began in the garage, searching three Mercedes Benz vehicles, a Harley Davidson motorcycle and adjacent closets in the garage. Nothing of evidentiary value was located.

We then searched two closets off the kitchen area on the east side. These can best be described as pantry or storage closets. Nothing of evidentiary value was obtained.

A small office with adjoining bath was then searched. In the bath area I located a phone message book with recent messages. This item was seized as evidence. Please note this bath and shower area are not used as designed but are storage areas containing a variety of items to include a gun safe in the shower and assorted household items.

We then searched a bath area and closet at the base of the main stairs in the foyer. Inside the closet two massage tables were located as well as partial nude female photographs. These items were later seized as evidence. Nothing of evidentiary value was noted in the bathroom.

We then searched two bedrooms upstairs on the east side of the residence. Located in the bath room of the south bedroom was penis shaped soap. Located in the bedroom of the northern bedroom was penis and vagina shaped soap as well as an adult sex toy. These items were seized as evidence.

We then searched the pool cabana located in the south west corner. of the property. Several photographs of nude females were seized as evidence.

I was then assigned to stand by with a person I believe was Douglas Schoettle. Mr. Schoettle was in the residence at the beginning of the search warrant. He was present during the warrant service and subsequent search. I stood by with him until the search was completed and I departed the residence. I had no conversation with him regarding the reason for our presence.

Regarding seized evidence, all items were photographed in place and then collected by CSEU personnel.

This concludes my involvement in this case.

On Thursday, October 20, 2005 at approximately 0936 hours, I assisted in the execution of a search warrant located at 358 El Brillo Way, Palm Beach, Florida, residence of Jeffrey Epstein. I was instructed by Case Agent Det. Joseph Recarey, to secure all computer and media related material from the residence.

Upon my arrival I was directed by Det. Recarey to a room designated as the Kitchen Staff Office. I observed a, Silver in color, CPU with the left side cover removed, exposing the CPU s hardware sitting on floor next to a glass type desk. The CPU had no discernable identifiers or features indicating a make or model. This CPU was powered off with the power cord not plugged in. The keyboard and mouse were atop the CPU. It should be noted that the CPU was not connected to a monitor, printer, or other media device. On the back Panel of the CPU, I observed an A/V card with RCA jacks attached. This type of hardware would allow audio and video to be downloaded onto the CPU s hard disk. The ends of the RCA jacks were unattached at the time of the search and no external camera was located within this room.

The CPU was located on the right side of a desk that held a flat panel LCD screen. The desk also held another keyboard and mouse, indicative of a second computer; however, no other computer was found. It appeared as though a second computer had been recently removed as the cables ends from the monitor, keyboard and mouse were in the same area. A further search of the room revealed no media storage devices, i.e. CD s, Floppy Disks, Zip Disks, etc. This type of media is commonly stored in an area where computers are placed, yet no media was found.

After completing a search of this room, I secured the CPU and turned all items over to the Evidence Custodian for future forensic analysis via a property receipt.

I was then directed by Det. Recarey to a room designated as the Garden Room, where I observed a wooden desk facing west. The desk held a flat screen LCD monitor, keyboard, mouse, media card reader and printer; however, no CPU was located. All of the cables were removed from an area where a computer had once been. A search of the desk area revealed no signs of any media devices.

Det. Recarey directed me to a third location designated as the Cabana room, which is detached from the residence and located just south of the pool. In the South East corner of the room, I observed an office type setting, with an L-shaped desk holding a flat screen LCD monitor, keyboard, mouse and printer; however, no CPU was located. All of the cables were removed from an area where a computer had once been. A search of the desk area revealed no signs of any media devices.

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Det. Recarey directed me to a second detached structure located on the South East corner of the property. This area of this structure was assigned with single letters to identify a particular part of the room. In the office area, designated as Room B, I observed a powered on Dell Dimension 2350, attached to an LCD flat panel monitor. The screen displayed an open Microsoft Internet Explorer browser with URL, address of http://home.bellsouth.net/. I observed no other active windows in the Start panel window and photographed screen. The power cord was removed from the back of the Dell CPU and I disconnected the cable modem to prevent remote access. At that time, the Dell CPU, marked with Serial Number 6WTVN21, was secured and turned over the evidence custodian for future forensic analysis via property receipt. I also located several media related items within Room B, which were recorded onto a property receipt and turned over the Evidence Custodians.

I then responded to a Bedroom designated as Room F, where I observed a white in color CPU marked Premio. The Premio CPU was in a computer desk which held a white CRT monitor, both of which were powered on. The CRT monitor displayed a message from Norton Antivirus software, warning of an expired subscription. I observed no other active windows in the Start panel window and photographed screen. I removed the power cable from the back of the Premio CPU and shutdown all other media. The Premio CPU, marked with Serial Number 2000091078, was secured and turned over the evidence custodian for future forensic analysis via property receipt. I also located several media related items within Room F, which were recorded onto a property receipt and turned over the Evidence Custodians.

This concluded my participation in the search of the residence.

On December 20, 2005, I contacted ASA Daliah Weiss in an attempt to subpoena the Epstein former houseman, Alfredo Rodriguez. Rodriguez, who resides in Miami, had eluded the process servers previously and was not served the investigative subpoena. A telephone message was left as she is not available during the week of 12/19/2005. I made contact with State Attorney Inv Theresa Wyatt and requested the same via telephone message.

I then researched the victim's SG cellular telephone subpoena data which had been received from a previous subpoena request. I analyzed the records which depict several calls from Haley Robson. The telephone calls start on February 6, 2005 at 12:49 pm.; the same day which the victim and the victim's father stated the incident occurred at Epstein's house. The first incoming call was from Robson's residence at

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cellular phone
occurred at 1:02 pm. The call durations
were one minute or less. The time frame was within thirteen minutes
apart. It should be noted that Robson's residence was in close
proximity to the victim's. The next call occurred at 5:50 pm when the
victim telephoned Robson's residence. Several calls were made after
the above mentioned calls both incoming and outgoing to Robson.
Further analysis showed no telephone calls to either Robson's cellular
telephone or Robson's residence were registered prior to February 6,
2005.

Additionally, I also conducted an analysis on the telephone calls from The subscriber information confirmed that the number is registered to Paul A Lavery from Hialeah, Florida. The address was crossed referenced to the Office of Kiraly and Riley Private Investigators. I researched the web page www.rileykiraly.com which also showed various cases in which they assisted. I also located another web site under www.coralspringssparklandrotary.org in which Mr. Riley attended a Miami Rotary meeting and confirmed Atty. Roy Black is among his clientele.

The telephone calls revealed Lavery had telephone contact with either just after I attempted to interview them, or just prior. A background was conducted on Lavery which revealed he holds a current Private Investigator License. A criminal arrest record revealed he had been previously arrested for possession of cocaine and solicitation of prostitution.

I also researched the girls using www.myspace.com. This web site is a new social networking service that allows members to create unique personal profiles online in order to find and communicate with old and new friends. The site allows one to establish your own myspace.com page and decorate the page any way one wishes. I found the following people have myspace sites: Haley Robson,

I received a Cingular Wireless packet which contained a CD which contained the results of the subpoena request for verbatim calls on An analysis will be conducted in the near future on the phone numbers called.

Investigation Continues.

Upon doing research on the message books recovered in the search warrant, I located the identity of The telephone number was registered to She currently is seventeen years old and is attending the Academy. I

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responded to 1801 Palm Beach Lakes Boulevard, also known as the Palm Beach Mall. I located the Foundation. I located inside the foundation and informed her that I was investigating a case against Jeffrey Epstein and knew she had been at the house. Started to cry and advised she had put that part of her life behind her. I explained that although she is seventeen years old I needed to inform her parents that she would be interviewed. She provided her home telephone number. I attempted contact and left voice mail messages at the house to speak with her

Det. Caristo and I then located at her residence located at in West Palm Beach. I attempted to interview her about Jeffrey Epstein. She advised she is so in love with Jeff Epstein and would do anything for him. She further explained that she would not speak with us about him either negative or positive. She asked us to leave her property. I informed her that although she did not wish to speak with us, I had sufficient information at this point in the investigation to know she was at Epstein's house and provided girls to Epstein to work. I also explained that prior to our arrival at her residence I had telephone contact with her father who was told she would be interviewed.

Station.

While at the police station, I left another telephone message for sparents. I began an analysis of Sarah Kellen's Cellular telephone. The telephone number is assigned to Sarah Kellen and the financially responsible party is Jeffrey Epstein of 457 Madison Ave. in New York City, New York. The time frame which was subpoenaed was September 2005, through October 2005. There were eighty seven pages of calls made either to the cell phone or from the cell phone. The local (561) numbers were analyzed. A spread sheet was prepared and placed into the attachment file of who was called.

The unknown numbers were researched using FoneFinder.com and subpoenas were requested to determine subscriber information. This was done to identify additional victims or witnesses. The analysis revealed that Kellen had called the victim/witnesses frequently when Epstein was in the Town of Palm Beach to "work." This confirms what the girls interviewed had previously stated. Kellen would notify them when Epstein was in town and their willingness to "work." The CD was placed into evidence.

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parents.

On December 29, 2005, I received a facsimile from National Compliance

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Troident Report Program: CMS301L Case No. . . : 1-05-000368 Center from Cingular Wireless for telephone number was the telephone number for Haley Robson during the time frame when the victim, was brought to the Epstein house to "work." An analysis of the phone records, of all incoming and outgoing calls, showed that on February 6, 2005, the day the victim, was brought to the house, Robson first called Sarah Kellen, Epstein's assistant, at at 12:50 pm (EST). The next call was made to Epstein's house in Palm Beach, at 12:52 pm (EST). The following call was made to the victim, at 1:01 pm (EST) and at 1:02 pm (EST). This confirms the information provided by the victim and victim's father. I photo copied the records and enlarged the page 8 of 10 to show the calls made by Robson on February 6, 2005. To this date, I have not heard from To this date, I have not heard from sparents. I will attempt to establish contact with them during the evening hours. s parents. I received a package from Atty. Guy Fronstin, which was hand delivered at the police station. Within the package, was a letter from Alan Dershowitz, and two www.myspace.com profiles. The profiles were that of and MySpace.com is a social networking service that allows members to create unique personal profiles online in order to find and communicate with old and new friends. This package was in response to a previous meeting in which Mr. Dershowitz called to assist in the investigation in providing any additional witnesses such as house employees who have been reluctant to speak with law enforcement. I reviewed the profiles Mr. Dershowitz enclosed. her blog to be "Fucking " still attends High School, sends and receives messages from friends which contain some profanity. Upon reviewing her friends' comments section from Myspace, most of her good friends sent messages to establish contact and invite her to go out. I then reviewed sweb blog which was provided by Mr. Dershowitz. Ms. designed her blog to be " Her blog states that her interests include music, theater and weed (Marijuana). I reviewed her packet in which declares her love for her live-in bovfriend. She also describes using marijuana with her boyfriend

The letter Mr. Dershowitz sent advised he was looking into the allegation that one of the private investigators used by the private attorneys of Epstein, attempted to impersonate or state that they were police officers from Palm Beach. Mr. Dershowitz advised that the investigators used to interview had "quite a distinct speech impediment", did not claim to be nor did they impersonate themselves as a police officer. This package was sent to both ASA Lana Belohlavic and ASA Daliah Weiss at the State Attorney's Office.

I made telephone contact with ASA Weiss to confirm she received the package and request an interview with Sarah Kellen, Nada Marcinkova, and Janusz Banasiak. She advised she would assist in attempting to

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|--------------|--|--|--|
| Case | No : 1-05-000 contact Mr. Dershowi | 368
tz. | (Continued) |
| | informed me that she
had requested the em
Mr. Dershowitz inform | I received a telephone call from made telephone contact with Mr ployees be available the week of med her that the assistants are quire additional time to locate | Dershowitz. She f January 3, 2006. out of the |
| | Investigation Continu | ues. | a a ± |
| ****
NA | ******* | *** N A R R A T I V E # 31 *** Reported By: MINOT, LORI S. Entered By: ALTOMARO, NICKIE A | |
| | Brillo. At this point FL tag In Road In Road Honda Civic bearing In driveway and a Black observed Tan Honda Cidriveway, Black Caddy tag At 1615 roadway, Black Chevy | Tobserved at 1155 hours, a Tobserved at 1155 hours, a Tobserved at 1155 hours, a Tobserved at 1165 hours, a Tobserved at 1165 hours. At the control of the c | Tan Altima bearing in drive, Tan Chevy Suburban in 1325 Hours I nevy Suburban in Kia car bearing FL vic, |
| | 1130 hours I observed roadway, Black Caddy bearing FL tag Honda Civic II Black Chevy SUV locat observed a Tan Honda driveway. At 1558 horoadway, Black Chevy | I continued surveillance at 358 a Tan Honda Civic bearing FL to Escalade in driveway and a Tan In roadway. At 1227 hours, In roadway, Black Caddy Escalade ed behind the Escalade. At 134 Civic n roadway and a Bours, I observed a Tan Honda Civic SUV in driveway, Black Caddy Escalade/make car parked in garage. | ag in unknown make/model observed a Tan in driveway and a 5 hours, I clack Chevy SUV in ic in calade in driveway |
| | 0713 hours, I observed and a Black Caddy Esc
Red Explorer i in Tan Honda Civic in roadway, Bl | d a Red Explorer bearing FL tag
alade in driveway. At 0814 hou
n roadway, Black Caddy Escalade
At 0952 hours, I observed a
ack Caddy Escalade in driveway,
also a Grey unknown make/model
scaping tools. | in roadway rs, 1 observed a in driveway and a Red Explorer Tan Honda Civic |
| | in the roadway in fro
early 20's, thin and
shorts, exited the ve
also observed a Red E | rved a Grey Camaro bearing FL to the of 358 El Brillo. A W/F, blot tall wearing a white tank top and the cand walked to the rear of explorer in roadway, Tan in the Caddy Escalade in drivers. | ond hair, teens to nd short blue jean the house. I Honda Civic |

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observed a Red Explorer W/F driver leaving the area, Tan subcompact on
roadway and a Red Neon bearing FL tag
Then observed 3 W/Fs,
approximately 16 to 18 years of age jogging. All 3 females ran into
the driveway. There were 2 with blond hair and one brown hair.

On Sunday, 04/03/05, I continued surveillance at 358 El Brillo. At 0719 hours I observed a Tan Honda Civic in roadway and a Black Caddy Escalade. At 0934 hours, I observed a Tan Honda Civic in roadway and a Black Caddy Escalade in driveway. At 1057 hours I observed only the Tan Honda Civic

On Tuesday, 04/05/05, I continued surveillance at 358 El Brillo. At 1052 hours, I observed a Red Explorer in roadway, a Green Explorer, bearing FL tag in roadway, a Grey Altima bearing FL tag in roadway, White Ford Truck in roadway, Black Mercedes in driveway being washed by a B/M and an unknown dark car parked in the garage. At 1059 hours a Blue Chevy Suburban drove to the house of 358 El Brillo and parked in the driveway. At 1119 hours, I observed the White Fort Truck leave the area and the drive was the pool man.

At 1126 hours, I observed a Grey unknown make/model car park in roadway. W/M got out of the car and walked to a house on the south side of El Brillo. At 1406 hours, I observed a Red Explorer parked on roadway and a large white box truck parked behind the surveillance suburban.

On 03/31/05, at approximately 1500 hours while conducting surveillance at 358 El Brillo, I observed a Black Cadillac Escalade, unknown tag, a Black Chevrolet Suburban, unknown tag, a Black Mercedes S600 FL tag parked in the east driveway next to the 3-car garage. There was a Tan Honda Civic FL tag parked on the street in front of the residence.

At approximately 1700 hours, I observed the Black Suburban, Black Escalade, Black Mercedes and Tan Honda Civic parked in the same place. At 1750 hours, there was no change in vehicles. At 1840 hours, I observed the Black Escalade, Black Suburban and Black Mercedes along with a Silver Hyundai Accent FL tag all parked in the east driveway and a Red Ford Explorer FL tag parked on the street in front of the residence.

At 2000 hours, I observed the Black Escalade, Black Suburban parked in the ease driveway and the Red Explorer and Tan Civic parked on the street.

On Friday, 04/01/05 at approximately 1700 hours, I observed the Black

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Escalade and Black Suburban parked in the east driveway and the Tan
Honda Civic parked on the street in front of the residence. At 1820
hours, I observed the Suburban and Civic in the same place and a Gold
Chevrolet Camaro FL tag parked on the street in front of the
residence. At 2250 there was no change. At 2330, I observed the
Black Escalade parked in the driveway and the Red Explorer parked on
the street in front of the residence.

On Saturday, 04/02/05 at approximately 1700 hours, I observed a Black Escalade, unknown tag, parked in the driveway and a Tan Honda Civic FL tag parked in the street in front of the residence. At 1805 hours the Escalade and Civic were in the same position and the Black Mercedes FL tag was also parked in the east driveway. At 1920 hours the Escalade and Civic were the only vehicles and both were in the same position. At 2030 hours and 2145 hours there were no vehicles observed.

At 2115 hours, I observed a Black Mercedes, 4-door parked in the east driveway FL tag At 2300 hours, 2350 hours and 0045 hours, the Black Mercedes was the only vehicle observed.

I made contact with Mr. I wished to interview his daughter. Mr. stated he was aware and had spoken with his daughter about the incident. He stated that his daughter had previously told him that she was hired to model lingerie at a Palm Beach mansion. Mr. stated he knew nothing else about what she did when she went to "work." Mr. advised he would cooperate with the investigation and make his daughter available for interviews. I asked if she was available for an interview, stated she was not at home at the moment. I informed him I would make contact with her at a later time. Mr. expressed his interest in the resolution in this matter as he stated this information has affected his daughter emotionally.

On January 4, 2005, I acquired the subpoenas from the State Attorney's Office for Cingular Wireless, Metro PCS, Verizon, Bell South Telecommunications and Sprint for the unknown telephone numbers from Sarah Kellen's cellular telephone. The subpoenas were sent to the respective telephone carriers for subscriber information.

I received a telephone call from State Attorney's Office, who informed me that the former houseman for Jeffrey Epstein, Alfredo Rodriguez, was present at the State Attorney's Office for an interview. Rodriguez was issued an investigative subpoena for an interview on the on-goings at Epstein's house during his employ. I responded to the State Attorney's Office and encountered Mr. Rodriguez waiting in the lobby. I brought Mr. Rodriguez to the interview room.

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During a sworn taped statement, Mr. Rodriguez stated he was employed by Jeffrey Epstein for approximately six months. He was referred by associates and his employment lasted the months of November 2004 through May 2005. His responsibilities as house manager included being the butler, chauffer, chef, houseman, run errands for Mr. Epstein and provide for Epstein's guests. Rodriguez advised he had very limited contact with Mr. Epstein. If Rodriguez needed to relay a message to Mr. Epstein, he would have to notify Epstein's secretary "Leslie" in New York City, who would then notify Epstein's personal assistant, Sarah, who would relay the message to Epstein. Rodriguez stated Epstein did not want to see or hear the staff when he was in residence.

I asked Rodriguez if Epstein received many guests during his stay in Palm Beach. Rodriguez advised he had many guests. I asked specifically about masseuses coming to the house. Rodriguez stated he would have two massages a day. Epstein would have one massage in the morning and one massage in the afternoon everyday he was in residence. Rodriguez stated he would be informed to expect someone and make them comfortable until either Sarah or Epstein would meet with them.

Rodriguez stated once the masseuses would arrive, he would allow them entry into the kitchen area and offer them something to drink or eat. They would then be encountered by either Sarah or Epstein. They would be taken upstairs to provide the massage. I asked Rodriguez if any of the masseuses appeared young in age. He advised he didn't ask their ages but felt they were very young. Rodriguez stated they ate like his own daughter who is in high school. Rodriguez stated they would eat tons of cereal and drink milk all the time. Rodriguez stated the girls that would come appeared to be too young to be masseuses. He stated one time under Epstein's direction, he delivered a dozen roses to High School for one of the girls that came to provide a massage. He knew the girls were still in high school and were of high school age. I asked Rodriguez about the massages. He felt there was a lot more going on than just massages. He would clean Mr. Epstein's bedroom after the alleged massages and would discover massager/vibrators and sex toys scattered on the floor. He also said he would wipe down the vibrators and sex toys and put them away in an armoire. He described the armoire as a small wood armoire which was on the wall close to Epstein's bed.

Epstein ordered Rodriguez to go to the Dollar rent a car and rent a car for the same girl he brought the roses to, so that she could drive her self to Epstein's house without incident. Rodriguez said the girl always needed rides to and from the house. Rodriguez referred himself as a "human ATM machine" and was ordered by Epstein to maintain a minimum balance of \$2,000 dollars on him at all times. When a girl would come by the house and Mr. Epstein was either not in residence or was not at home at the time, Rodriguez was to provide the girl (masseuse) several hundred dollars for their time and to notify Epstein the amount they were given. Epstein also ordered Rodriguez to

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purchase several gifts and provide them as tips to the girls. I asked
what kind of gifts. Rodriguez stated he purchased IPODS, jewelry,
anything the girls would want.

Rodriguez stated the amount of girls that came to the house was approximately fifteen. Each of the girls knew each other and all seemed to know at High School who Mr. Epstein was. When asked to identify these girls, Rodriguez stated he could not at the moment but knew he wrote their names down on a journal he kept during his employ with Mr. Epstein. He kept a journal in the event he needed to explain either to Mr. Epstein or his assistants what was done at the house or who visited the house as he stated he was in-charge of Mr. Epstein's personal security while in Palm Beach. I informed him I would need to view this journal to which he stated he would research the book and contact me to provide the book. The interview was concluded and left the area. I returned back to the police station where the micro cassette was placed into evidence. At approximately 7:20 pm, I was notified Rodriguez located the journal and would call me on January 5, 2005 to provide the journal.

Investigation Continuesaa

On January 5, 2006, I attempted to meet with Alfredo Rodriguez to recover the folder or journal in which he kept the notes that were given to him during his employ with Mr. Jeffrey Epstein. He kept this folder to justify what he did during his employ should the need arise to justify what occurred with the monies he had to keep or any questions as to the petty cash he withdrew from the household account from the bank. At approximately 10:00 pm, I attempted contact with Mr. Rodriguez and discovered he was assisting his wife at her place of employment and would not be able to meet with me. Mr. Rodriguez stated he would meet with me on January 6, 2006, in Broward County, in the morning hours.

On January 6, 2006, at approximately 9:00 am, I received a telephone call from Mr. Rodriguez who advised he had the file in hand and would be traveling northbound to meet with me in Broward County. At 10:50 am, I met with Alfredo Rodriguez at the parking lot of Bank of America in Boca Raton on Yamato Road and Military Trail (known as the Polo Center). Rodriguez produced a green folder which contained documents, a note with Mr. Epstein's stationary with direction to deliver a bucket of roses to High School after high school drama performance. Also in that same note was direction to rent a car for and direction to extend the rental contract. I returned to the Palm Beach Police Station and placed the folder into evidence.

I received a fax from Verizon from the subpoena request sent on

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Time: 8:47:53 Incident Report Program: CMS301L Case No. . . : 1-05-000368 (Continued) 01-04-06, for telephone number The phone number is registered to Dr Perry Bard, from West Palm Beach. Dr. Bard is a chiropractor and has an office located in the Palm Beach. The cellular number is Dr Bard's personal cellular number. On January 9, 2006, Det. Caristo and I traveled to Palm Beach Gardens in an attempt to locate Johanna Sjoberg, who had been previously seen on the property and identified through her Florida Drivers License and Florida license Plate. A business card was left for her to return my call. We then traveled to the Foundation and located agreed to speak with us and in a private room within the school provided us a taped statement. During the statement, advised that when she was fifteen or sixteen years of age, she was taken to Jeffrey Epstein's house by her associate, stated this occurred late May 2004 or early June 2004. She was told she could model lingerie for money for a wealthy Palm Beacher. She remembered they traveled by yellow cab from their residence in West Palm Beach to Epstein's house. She remembered encountering Epstein at the front door during the evening hours. He introduced himself and brought them into the kitchen so that the chef could prepare something for them to eat. After having a meal, and Epstein brought upstairs to a master bedroom which had a large bathroom. She observed a large style shower, sauna and there was a large massage bed also in the bathroom. Epstein entered a there was a large massage bed also in the bathroom. Epstein entered a room within the bathroom and came out wearing only a towel.

said they would provide a massage on his feet. asked why they are doing this. told her this was part of the routine and told her to rub his legs and calves. Epstein had told to get comfortable. Continued rubbing Epstein's calves and feet. At Epstein's direction, then left the room leaving there by herself. Epstein told to get comfortable. The provided her blouse and pants and stayed in her panties. Stated she was not wearing a bra. She believed she was wearing thong panties. Epstein turned over onto his back and began touching her. Epstein touched her breasts and began touching her in her vagina area. Epstein instructed her to rub his chest and rub his nipples. stated the touching consisted over the panties on the first time; he stroked her vagina but stayed on top of the panties. During the first massage, she stated Epstein was stroking her and began masturbating himself at the same time. He put his hands under the towel and appeared as to masturbate himself however she never saw his penis. She continued rubbing his chest until he grabbed her and pulled her closer to him. He appeared to have climaxed because after he pulled her closer to him the massage was over. Epstein had told her that there was two hundred dollars for her on the dresser. He told her

that she could not tell anyone what happened at the house or bad things could happen. stated she went to Epstein's house three

Date: 7/25/06 PALM BEACH POLICE DEPARTMENT Page Time: 8:47:53 Incident Report Program Case No. . . : 1-05-000368 or four times total. was very scared and felt very nervous. She knew because of Epstein's money he was powerful. After the massage, Epstein ordered his houseman at the time to drive the girls home. The employee was to drop off the girls at their house and watch them go inside their house. could not remember who the houseman was. She stated Epstein and his assistant Sarah would call her at her father's house to arrange for her to come and "work." She advised each time she returned to the house, Epstein would do the same thing. Stated it was a routine with Epstein. She would rub his feet and calves. He would then turn over and begin to touch her on her vagina area. The only difference was that it was done without panties. Epstein's fingers would stroke her vagina area as he would masturbate and finally climax and the massage would be over. She was paid \$200.00 each time she went. Each time she went she was reminded not to speak of what happened at the house and that she would be contacted again. She began to purposely miss the calls when either Sarah or Epstein would call her. She once brought a friend, unknown last name, to work for Epstein. She was paid \$200.00 for bringing stated she no longer retuned to work for Epstein. She also stated that she wanted to notify the police of what happened at the house. stated she was scared of what could have happened to her or her family if she notified authorities. On January 10, 2006, I received the results from the subpoena from BellSouth Telecommunications for telephone number

The number is assigned to

Beach Gardens. I also received the results from Western Uniform Western Uniform Jeffrey

The from Jeffrey

To Jeffrey

T Epstein in New York City. The "wire" was sent by Jeffrey Epstein of 457 Madison Ave in New York City on December 23, 2004 at 12:05 pm. The amount of \$222.00 was charged to Epstein's credit card so that could receive \$200.00 in Royal Palm Beach. The twenty-two dollars was for processing and local fees to send the money via Western Union. A copy of the check presented to was also attached to the receipt of the wire. This confirmed what advised she received as a Christmas bonus from Epstein. Investigation continues. *********************** NARRATIVE # 35 ******************* Reported By: RECAREY, JOSEPH 1/10/06 Entered By.: ALTOMARO, NICKIE A. 1/10/06 I received and reviewed the Cinqular Wireless results from the subpoena requests for subscriber information for telephone numbers . The first number, , is assigned to Janusz Banasiak in care of Jeffrey Epstein of 457 Madison Ave in New York City. Banasiak is the current houseman/house manager for 358 El Brillo Way in Palm Beach, Fl 33480. The second number, is assigned to Christina Venero of

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Vehicles that were previously documented on the property while surveillance was being conducted were researched. I determined a tan Chevrolet Camaro, bearing Florida license was seen on the property in which a young white female was seen entering the Epstein property. Research was conducted which revealed that the vehicle is registered to were researched.

Mr. has two daughters, is currently residing in Connecticut and research on revealed she was recently involved in a traffic stop in Lake Clarke Shores in May 19, 2005. A request to discover any information from the stop was requested.

I spoke with ASA Daliah Weiss who informed me that Janusz Banasiak will be available for an interview tomorrow at the State Attorney's Office in West Palm Beach at 1:30 pm. I informed her that I would be at her office for the interview.

On January 19, 2006, Det. Caristo and I met with Johanna Sjoberg at in Palm Beach Gardens. Sjoberg was identified as a licensed massage therapist who had previously been seen on Epstein's property when physical surveillance was done. Sjoberg was told of the on going investigation and I felt she may have information pertaining to the case. During a sworn taped statement, Sjoberg stated she met Epstein three years ago when Ghaline Maxwell approached her while she was attending Palm Beach Atlantic College to work around Epstein's house. Maxwell had told her that they needed some girls to work at the house to answer phones and run errands. Sjoberg accepted the job and began working at Epstein's house on El Brillo in Palm Beach. Sjoberg stated it was a part time job during the time she went to Palm Beach Atlantic College. She continued going to Epstein's house and would be notified when Epstein would travel to Palm Beach. Sjoberg advised she would be notified by Maxwell, Epstein or Sarah, his assistant, when he would travel to Palm Beach. Sjoberg stated she began providing massages to Epstein before she became a massage therapist. She continued giving massages not only to Epstein but to Nadia Marcinkova, and Sarah, his assistant. Sjoberg was asked about what occurred during the massages. Sjoberg stated as she was twenty

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Case No. . . : 1-05-000368 (Continued) three years old when she met Epstein, anything that happened was between two consenting adults. I explained to her that she was not in any trouble however as part of this investigation, I needed to ask certain questions. Sjoberg stated that there were times that Epstein would ask her to perform during the massage. He would instruct her to rub his nipples as he masturbated himself. Sjoberg stated she felt "grossed" about the behavior but as she was getting paid, she just continued. Sjoberg also advised she would on occasion perform the massages naked. Epstein would on occasion, utilize the vibrator/massager on her vagina area when she performed the massages. Sjoberg explained that Epstein never exposed himself to her as he

I asked if Sjoberg ever received any gifts, or any gratuities from Epstein. Sjoberg advised aside from being paid well, she advised Epstein took care of her tuition from Palm Beach Atlantic College. She received a rental car for a week when her scooter broke down.

Epstein would masturbate he would be covered.

maintained himself covered under the towel he would be wearing. When

Additionally she received other gifts from Epstein. Epstein also recommended her to another client who resides at Breakers Row in Palm Beach. The client she was referred to was "Glenn" unknown last name, and his wife, who she provided a massages to. The statement was concluded and placed into evidence upon our return to the Palm Beach Police Department.

While at the police station, I researched Florida tag which was also previously seen on the property when there was physical surveillance being done at the property. The vehicle is registered to Lake Worth, Florida. Researching Mr. and the vehicle revealed that his daughter, had been driving the vehicle and was cited for unlawful speed in Lake Clark Shores. The vehicle is a tan, Chevrolet Camaro, 2-door. I researched late of birth, has a my space page called In her web page, shows various photos of photographed at a beach. An interview is forthcoming.

A review of the video disks which was extracted at the Palm Beach County Sheriff's Office Computer Crime Unit revealed that only one hidden camera was functional at the time. Several images of Epstein working at his office were seen. Additional footage of Sarah Kellen and Nadia Marcinkova was seen. There was other footage of females seen. The identity of the females is unknown at this time, until such time as I meet with certain females to show the video footage to confirm if, in fact, it is them on the video. At this time it appears that and Haley Robson are seen sitting with Epstein beside his desk in the evening hours. Due to poor lighting, a direct confirmation cannot be made at this time.

Inv. Continues.

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Reported By: RECAREY, JOSEPH
                                                                                                                                        1/30/06
                                                Entered By .: ALTOMARO, NICKIE A.
                                                                                                                                        1/30/06
        On January 25, 2006, Det Caristo and I. responded to

and met with

year, when she was seventeen years of age, she met Jeffrey Epstein
through her former room mate

Epstein at the time.

and had once cohabitated together
when they modeled.

explained called her on her telephone
and advised her that she was in Palm Beach and requested to see her.
        made arrangements to meet with her at Epstein's house.

arrived and met Epstein and

Beach Mall together and went shopping.

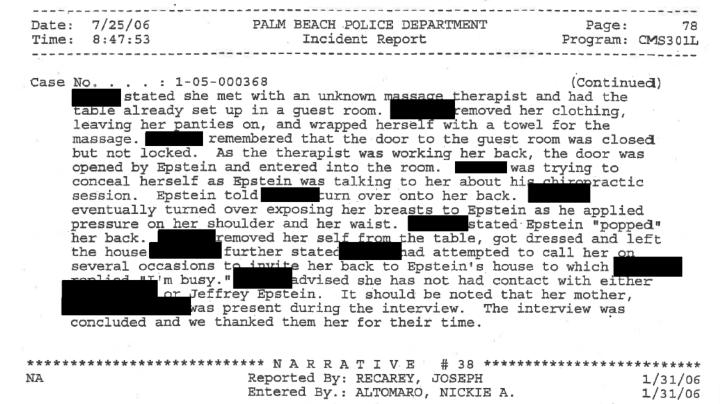
advised that and she had received money from Epstein to go to the mall. They visited
        Victoria's Secret and purchased undergarments from the store utilizing monies given by Epstein. advised she purchased one item and purchase various items. The money used to purchase the items
        was the money given by Epstein.
                                   continued shopping and having a day together.
        stated explained how she and Epstein have been dating each other and he has been paying all of her bills. I claimed advised they met in New York and had been dating ever since. They later
        returned to Epstein's home and encountered Epstein. He had a brief conversation with about her modeling career. He knew of her modeling career from the requested to see her modeling
        portfolio and explained that he could help her with modeling jobs.

had her book with her to show and showed the book to

Epstein. He commented negatively about her photographs and portfolio.
        felt uncomfortable with the comments made as she had been
        working with other professional modeling companies who had offered her
       work from her photographs. Epstein requested to see what was purchased at the mall. Look out the undergarments which were
       purchased. She immediately showed Epstein different sets purchased. Epstein then requested to view what purchased. was reluctant to show the outfit however since it was Epstein's money that
       purchased the item, she pulled it out of the bag. Epstein asked her to try it on. looked at who told her "yeah, try it on." Feeling compelled to try the undergarment outfit on; she went to
        another room and put on the bra and panty set. She walked out to the
        living room where they were sitting, and modeled the suit. She then
       went back into the other room and changed back into her clothes.

returned into the room and told she would be going home.

scheduled another day for to return for massages with her.
       and have a massage. Part and told her that she would be unable to stay with her as she would be going on a bike ride with Epstein.
                  explained she could stay at the house and take advantage of the
       massage.
```



On January 27, 2006, I made telephone contact with Christina Venero, at Section 27. Venero is a licensed massage therapist who had frequented the home of Jeffrey Epstein. Ms. Venero has been unable to meet with me in Palm Beach County, and because she lives and works in Port St Lucie, a telephone interview was conducted. I explained to Ms. Venero that there was an on going investigation involving Jeffrey Epstein.

Venero stated she knows Epstein and has been employed by him for approximately three years. Epstein has paid Venero to perform Swedish Massages (Deep Tissue) on him and other guests. Venero explained that approximately three year ago she met Ghislaine Maxwell and Jeffrey Epstein through a mutual friend. Epstein and Maxwell were looking for a massage therapist. Venero stated since that time, she is notified when Epstein is coming to Palm Beach. Venero stated she comes to his house and provides the massage or massages. Venero explained she has also massaged his guests and assistants. Venero continued that she is paid \$100.00 and hour for the massage.

I asked Venero if anything occurred during the massage that would have made her feel uncomfortable. Venero stated she only provided massages and that was it. She never was approached for anything else. I asked if Epstein ever asked her to rub his chest she stated she would not rub his chest as that is not part of her massage. Venero explained that she was not Epstein's type. The girls she would see at Epstein's house were very thin, beautiful and without tattoos. Venero explained she has several tattoos that are visible. Maxwell and Epstein have commented negatively about her tattoos previously when she has provided massages.

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(Continued)

Venero stated she only provided massages for Epstein and his associates and nothing happened during those massages. Venero stated as she does Swedish style massages, the patient is usually sore after the massages. I thanked her for her assistance and the interview was concluded at this time.

I received a facsimile from T-Mobile Cellular service on telephone number which is assigned to David Rodgers, pilot for Mr. Epstein, who resides in Lake Worth. Rodgers' telephone number was dialed on several occasions by Sarah Kellen. A background on Rodgers indicated he has a valid FAA pilot license First Class for the Southern FAA Region. Rodgers has another historical FAA license for Airline Transport Pilot.

Investigation Continues.

On Friday. February 3, 2006, I had made arrangements to meet with the Palm Beach Police Station. At approximately 1:00pm, and her friend, station. During an interview with she stated she met Epstein when she turned eighteen years out and was brought to Epstein's house to provide a massage. She advised this occurred on May of 2005. She advised Haley Robson had informed her if she wanted to provide a massage for \$200.00. Igreed and was brought to Epstein's house to provide a massage. Igreed and was brought to Epstein's house to provide a massage. If you had been to the house on many occasions during the massage sessions. If also stated she would remove her clothing to provide the massage on Epstein. If advised Epstein would pay her \$300.00 to rub his back, legs and chest. During the massages, Epstein would masturbate himself as she rubbed his chest. If asked her if Epstein ever touched her breasts during the massages. If asked her if Epstein ever touched or massaged her vagina. If asked her if Epstein ever touched or massage he inserted his fingers in her vagina as she massaged him. She stated this occurred one time only. If he ever penetrated her with stated the stated the massage would be over when Epstein would climax onto a towel. I asked her if she had any formal massage training to which she replied that she did not. If was then asked if she ever brought anyone to the house to "work." If asked she brought two people to the house. She advised she received money for bringing people to the house to "work." If the lobby of the police station. I thanked the police station. I thanked the police station and escorted her to the lobby.

I asked Ms if I could speak with her about this investigation. I

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brought her to the interview room and explained to her that I was conducting an investigation on Jeffrey Epstein and felt she may have information pertaining to the investigation. Ms identified herself as and resides in Wellington, Florida. She advised approximately a year ago she was brought to Epstein's house to provide a massage for money. Stated she needed to make money and felt it was a quick way to make some money. Stated she was brought to the house by and was introduced to Epstein and his assistant. She was brought to his main bathroom and provided a massage. I asked her if she provided the massage naked. Stated she did. She rubbed Epstein's legs, back and chest. I asked if Epstein touched her during the massage. She advised he did not, however he did masturbate himself as she rubbed his chest. Once he climaxed the massage was over. She was paid her money and left the area. Advised it occurred one time and she never returned to the lobby.

I located a telephone number for and attempted to contact her on several occasions. I called and spoke with Ms. who advised she would speak with me in Deerfield Beach where she resides. Due to a scheduling conflict, we were unable to meet. I informed her I would contact her to schedule another appointment to speak with her about this investigation. I have attempted to meet with her and make telephone contact with negative results.

on February 13, 2006, I met with David Rodgers at in Lake Worth. Rodgers was identified as Epstein's pilot. I spoke with Rodgers who advised he has been employed with Epstein since 1991. He flies both planes for Epstein depending where he wants to fly to. Rodgers was asked about passengers in the plane he flies. Rodgers stated unless Epstein flew to his island off of St Thomas, there would be no way of knowing who the passengers were. I mentioned a recent flight to Ohio, where Rodgers flew to Ohio to pick up Rodgers stated he recalled flying on several occasions and did remember Rodgers stated once he is in the cockpit, he does not know who the passengers are. When he prepares the passenger manifests, he lists Epstein and his assistants he knows by name, Sarah and Adrianna. Rodgers stated he would list either female or male passengers on the manifests only to keep a count on the passengers. Mrs. Rodgers came into the living room and recommended that her husband consult with an attorney. Mr. Rodgers agreed he would speak with the family attorney to inform him of this questioning. I explained to Mr. Rodgers that he was not the suspect in this investigation and ceased all questions. Based on the fact Rodgers could not advise who passengers were in the plane, I then left the area.

I attempted to locate at at in Wellington. I left my business card for her to return my call. On February 14, 2006, at 12:06 pm, I received a call back from Ms.

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Time: 8:47:53 Incident Report Program: CMS301L Case No. . . : 1-05-000368 (Continuon my voice mail. Ms left her telephone number for a return I left her a message to return call. Investigation Continues... ************************ N A R R A T I V E # 40 ***************** Reported By: RECAREY, JOSEPH NA 2/21/06 Entered By.: ALTOMARO, NICKIE A. 2/22/06 On February 15, 2006, I made telephone contact with provided directions to where I could locate her. Det Caristo and I responded to

in Lake Park to meet with

Upon my arrival, I met with in the parking lot directly
behind MAACO Auto Painting. She was advised I was there to speak with her about an ongoing investigation that concerned Jeffrey Epstein in Palm Beach. stated she knows Epstein very well and did not want to speak with me about Mr. Epstein. She was very fond of Epstein and did not want to speak with me about anything concerning Jeffrey Epstein. I explained to her that she was seen at the house and I would like to speak with her. She stated she knew there was an investigation and that I had spoken with other people and therefore I should know what happened at Epstein's house. ended the conversation and walked back into her boyfriends business, Blanton Automotive. Det Caristo and I left the area and returned to the police station. Investigation continues. Reported By: RECAREY, JOSEPH Entered By: ALTOMARO, NICKIE A. 4/10/06 NA 4/10/06

A Grand Jury Session was requested during the month of February 2006, in which all the girls that had been interviewed would have been called to testify before the Grand Jury to seek an indictment against Jeffrey Epstein. Due to subsequent meetings with the State Attorney's Office and Defense Attorney Alan Dershowitz the Grand Jury was postponed until a later time. Dershowitz had provided a package of material on the main victims in this case in which they appear on myspace.com and speak about alcohol use and some marijuana use. The State Attorney's Office wanted time to review the material.

I requested additional subpoenas from the State Attorney's Office in which I requested information from Dollar Rent a Car and Jet Aviation. The information requested from Dollar Rent a Car was for the rented vehicle by Alfredo Rodriguez while under the employ of Epstein for one of the victims. The other subpoena requested was for Jet Aviation for dates and times when Epstein's planes were in Palm Beach County.

I continued to research other names that were acquired either from interviews or intelligence gathered during the investigation. I

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Royal Palm Beach. During the interview.

stated she knew I would be speaking with her.

was first introduced to Epstein when she turned eighteen years old.

stated she was sure of her age as it was her senior year in

High School. She advised she was brought there to Palm Beach guy. She remembered she met Epstein and his assistant Sarah in the kitchen area. She stated she was taken by one of her friends, She stated she went upstairs with Sarah while got ready for the massage. He exited his bathroom naked and She stated she went upstairs with Sarah while Enstein turned around. Epstein asked her if being naked offended her. stated it made her uncomfortable. Epstein then put on a towel and lay on the table. stated she rubbed his back and feet. She stated she had no massage training or experience. stated during the massage, Epstein attempted to touch her buttocks. pulled away as he touched her buttocks. She told him again she was uncomfortable with him touching her. Epstein then cut the massage short and became upset with her. Epstein paid her \$200.00 for the massage and told her to leave the house.

never returned to the house. She did advise of one time she went with however she waited in the car for want to go into the house.

Epstein they left the area.

Stated she had heard from other girls that have gone to the house that Epstein now required them to do the massage naked and allow him to touch them in their private areas for monies. The interview was concluded as did not have any other information to provide. I then learned from the original victim, the defense attorney had learned of her identity. I spoke with the father of the victim, who stated there has been a private investigator on his house photographing his family and chasing visitors who come to the house.

He provided a Florida License of This vehicle is registered to Ivan Robles of West Palm Beach. Robles is a private investigator intern who is licensed by the state. I informed the State Attorney's Office of the above information. I received the Grand Jury subpoenas to be delivered to three victims for a Grand Jury session to be held on April 18, through April 20, 2006. Investigation continues. NA Reported By: RECAREY, JOSEPH 4/14/06 Entered By .: ALTOMARO, NICKIE A. 4/18/06 The Grand Jury Subpoenas were personally served to the individuals they were issued to. On April 5, 2006, at approximately 7:30 p.m., I personally served the parents of who had informed me that the

private investigators were still photographing the family. On April

Date: 7/25/06 PALM BEACH POLICE DEPARTMENT Page: 83
Time: 8:47:53 Incident Report Program: CMS301L Case No. . . : 1-05-000368 (Continued) 10, 2006, at approximately 2:30 p.m., I served at her residence in Royal Palm Beach. The subpoena was given to her mother, I learned through one of the victims that she was personally contacted through a source that has maintained contact with Epstein. The source assured she would receive monetary compensation for her assistance in not cooperating with law enforcement. AH also stated she was told, "Those who help him will be compensated and those who hurt him will be dealt with." I told that tampering with a witness/victim is an arrestable offense and very serious. I asked her who approached her during this encounter. originally was reluctant to provide the name of the person who approached her to offer her not to testify because she felt they were still friends. On April 11, 2006, Det Dawson and I traveled to Tallahassee, Florida and met with the victim, identified W/F, she was home during Spring Break in March 2006. The less stated she did not want to pursue the intimidation charges on was concerned that the defense attorney was given a copy of the report as certain things she had told me in confidence were repeated to her by . Prior to our departure, the victim was given a copy of her subpoena for the Grand Jury which was scheduled to commence April 18, 2006.

Upon our return from Tallahassee, I notified the State Attorney's Office of what was told to me. I also notified them that the subpoenas were delivered to the witnesses and they would be calling for arrangements for the date and time needed for the Grand Jury. I spoke with ASA Weiss and informed her of the possible intimidation by the defense.

On April 13, and April 14, 2006 I attempted contact on several occasions with ASA Weiss and ASA Belohlavic to ascertain when the victims needed to report for Grand Jury testimony. Messages were left on their voicemail. On April 17, 2006, during the hours of 9:00 am and 11:30 am, I again left messages for ASA Weiss and ASA Belohlavic for either of them to return my call as I had not heard from the State Attorney's Office as to the time and date of the Grand Jury.

At approximately 12:30 pm, I went to the State Attorney's Office and located ASA Weiss and ASA Belohlavic in their offices. I entered ASA Belohlavic's office who informed me that she was going to return my call. She explained that an offer was made to the defense, Atty Guy Fronstin and Atty Alan Dershowitz. The offer is 1 count of Agg Assault with intent to commit a felony, five years probation, with adjudication withheld. Epstein would have to submit to psychiatric/sexual evaluation and no unsupervised visits with minors. When asked about the all the other victims, ASA Belohlavic stated that was the only offer made as to one victim, ASA Belohlavic cell phone rang and went to voice mail. She checked her voice mail and played the message on speaker. The caller identified himself as

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(Continued)

Atty Guy Fronstin and acknowledged the deal made between them. Fronstin stated in the message, he spoke with his client, Jeffrey Epstein, and agreed to the deal. Fronstin asked to call off the grand jury as they would accept this deal. Belohlavic stated a probable cause would be needed to book Epstein in the county jail and would let me know as to when it would be needed. I explained my disapproval of the deal and not being consulted prior to the deal being offered. However I expressed that was only my opinion and the final approval would come from the Chief of Police. She explained to have Chief Reiter call Barry Krisher about the deal. I left the area and returned to the police station where I briefed the Chief about the deal offered.

I checked my voice mail messages and discovered a message from stepmother for the victim She was calling because the State Attorney's Office still had not returned any of her calls as to when they are needed for this case. I then called ASA Belohlavic's office and left messages for her to call the victims on this case and explained to them what the State Attorney's Office had done.

On April 17, 2006, at approximately 4:30 pm, State Attorney Investigator Tim Valentine called to officially notify me of the cancellation of the Grand Jury. He requested I contact the victims that had been served to appear, to notify them of the cancellation. I advised Valentine that as this Grand Jury session was called based on the State Attorney's Office decision to have the victims heard by the Grand Jury that I felt it was the States Attorney's Office responsibility to contact the victims and advise them of the reason they were no longer needed.

As I had not received any contact from anyone at the State Attorney's Office, on May 1, 2006, I prepared three arrest warrant requests and submitted them to the State Attorney's Office. The packages were delivered to the Crimes against Children Unit in care of ASA Lana Belohlavek. Jeffrey Epstein's arrest warrant was requested for 4 counts of Unlawful Sexual activity with certain minors and one count of Lewd and Lascivious Molestation. Sarah Kellen, Epstein's assistant's, arrest warrant request was for 4 counts of Principal in the 1st degree Unlawful Sexual activity with certain minors and one count of Principal in the 1st degree Lewd and Lascivious Molestation. Haley Robson's arrest warrant request was for Lewd and Lascivious Acts on a victim under 16 years of age. The receipt of delivery was signed and brought back to the records division at the police department.

On May 3, 2006, at approximately 2:54 pm, I received a telephone call from ASA Daliah Weiss on my cellular telephone. ASA Weiss advised she

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On May 10, 2006, information was received that Epstein's associate, Leslie Wexner, The Limited Inc, CEO's, plane had arrived in West Palm Beach, PBIA. The plane, a Gulfstream 4 bearing a N900LS registration, was on the tarmac at Galaxy Aviation. As Epstein had recently acquired the services of a new attorney, and the fact that Epstein's house is currently under remodeling, it was believed that Epstein may be in Palm Beach. I conducted physical surveillance at the residence, 358 El Brillo Way. I observed a large construction crew conducting remodeling at the house. The contractor, David Norr, was observed driving a Ford Explorer, white in color. The vehicle has a Florida registration of F30QQF. Norr left Epstein's house and traveled north on County Road. Det Caristo and I conducted surveillance on Norr. Norr traveled to several construction sites and checked on certain jobs. Surveillance was discontinued on Norr and Det Caristo and I traveled to-Galaxy Aviation. I observed the white plane with a blue stripe along the body and tail of the plane; the tail number was visible on the bottom of the tail, closer to the body of the plane. We maintained visual surveillance on the plane until 4:57 p.m., when a caravan of Cadillac Escalades drove onto the tarmac. We observed several people exit the vehicles and discovered that they were part of the executive team for Limited Inc. The executives were in Palm Beach County for an executive meeting for the day. They arrived in Palm Beach County on May 9, 2006 at 9:30 pm and were scheduled to leave on the 10th at 5:00 pm.

On May 12, 2006, I met with ASA Lana Belohlavek at the State Attorney's Office. She explained that her boss, Barry Krischer, was requesting this case be taken to the Grand Jury again. I explained to her I had requested arrest warrants for Jeffrey Epstein, Sarah Kellen, and Haley Robson. I asked that she either issue the warrants or direct file, as so much time has elapsed since the original request to the Grand Jury. I explained that the Palm Beach Police Department had concluded the case in December of 2005 and has been waiting for the case to go forward. Belohlavek stated the original offer was again offered to the new defense attorney. She was waiting for their answer by Friday May 19, 2006. She stated she would advise me of the answer.

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Entered By.: ALTOMARO, NICKIE A.

(Continued) 6/06/06

On May 22, 2006, I received several phone calls throughout the day from Mr. who stated he had been followed aggressively by a private investigator. Mr. stated that as he drove to and from work and running errands throughout the county, the same vehicle was behind him running other vehicles off the road in an attempt not to lose sight of Mr. weblicle.

I explained to him as Mr. Epstein had retained new legal council it was possible it would be new private investigators following him to observe his daily activities. I also explained to him that there was a meeting scheduled with ASA Lana Belohlavek and Attorney Jack Goldberger at Mr. Krischer's office scheduled on June 1, 2006 at 9:00 am. I attempted to call ASA Lana Belohlavek to inform her of the private investigators following Mr. Thowever; she was on her vacation during the week of May 22 through May 30 2006.

On May 23, 2006, I received other phone calls from Mr. and Mrs. who advised they were able to acquire the private investigators license plate information. The subject following them was again driving very aggressively and caused Mrs. to run off the road. Mrs. stated the vehicle is a green Chevy Monte Carlo bearing Florida tag The vehicle is registered to Zachary Bechard of Jupiter Florida. Bechard is employed with Candor Investigations from Jupiter, Florida. Bechard is a licensed Private Investigator in the State of Florida.

Since the discovery of the threat made against one of the victims in this case I requested subpoenas for all calls made to and received from during the month of March 2006 for her cell phone and home phone. I had confirmed with Florida State University the exact dates of Spring Break for 2006. The Spring Break was from March 4, 2006 through March 12, 2006. I received a subpoena from Sprint/Nextel with all calls made during the month of March 2006. I reviewed the 989 calls made and received during the month of March 2006. I observed on March 7, 2006, made and received thirty five calls during that day.

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| -Mar-06 | 11:22 AM | 887.2 | Inbound | 561XXXX | |
| Mar-06 | 11:37 AM | 48 | Outbound | | |
| Mar-06 | 11:39 AM | 28.2 | Inbound | | |
| ar-06 | 12:02 PM | 727.2 | Inbound | | |

table reflects the date of the calls, time of day (EST), duration

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Case No. . . : 1-05-000368 (Continued) of call in seconds, inbound or outbound calls and calls made to or from sphone. On March 7, 2006, at 11:03 am, made a call to the victim which lasted 492 seconds (8 minutes and 2 seconds). The victim then returned the call at 11:16 am which lasted 6 seconds. The victim then made contact with at 11:22 am for 877.2 seconds (14 minutes and 6 seconds). These sequences of calls were consistent with what the victim had described to me on the date of the intimidation. Immediately after speaking with the victim, makes a call to Sarah Kellen, Epstein's assistant, which lasts for forty-eight seconds. A call is then immediately received, a telephone number registered to a Corporation affiliated with Jeffrey Epstein located at 457 Madison Ave in New York. An extensive computer check revealed 457 Madison Ave is a business address in which Epstein has his corporations assigned to. Epstein had corporation attorney, Darren Indyke, register the businesses and register himself as an agent. I also observed Epstein has his El Zorro Ranch Corporation, New York Strategy Group, Ghislaine Corporation, J Epstein and Company and the Financial Strategy Group registered to this same address.
Finally, a third call is received by at 12:02 pm from the same corporate number which lasts 12 minutes and 1 second. It should be noted that there is no further contact with either the victim during the month of March or April of 2006. I also noted that there was no further contact with Sarah Kellen or Jeffrey Epstein during the remainder of the month of March or April 2006.

On June 1, 2006, ASA Lana Belohlavek telephoned me to inform me of the meeting that occurred with Atty. Jack Goldberger and her reference this case. She advised she would make her determination on whether to file on this case or not by Monday June 5, 2006.

Inv Continues.

On June 29, 2006, I had spoken to ASA Lana Belohlavic who informed me that the case would be sent to the Grand Jury for charges. She informed me that the grand jury would convene on July 19, 2006 to hear the Epstein case. Belohlavic stated State Attorney Barry Krisher made the determination to go the Grand Jury to hear the case.

On July 12, 2006, I spoke with Mrs. mother of the victim, who inquired about the status of the case. I explained to her that I was told we would be going to the Grand Jury during the week of July 19, 2006. She stated she had not been contacted as of yet by the State Attorney's Office for any information. I provided her with the telephone numbers to the State Attorney's Office.

Investigation continues...

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| 18 | 1s | VI | TEB | PBI | | 1063 | JE, ET, I FOM DLE | 1/_1 | 24 | |
| 20 | 11 | 11 | PBI | TIST | | 1064 | IL, GM, GT, GWENDOLHN BECK, SHARES | 1/ | 20 | |
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| 25 | 14 | VL | TNCM | TEB | | 1066 | 36,6M,GT,ML,SC | 1/ | 42 | |
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| 31 | 10 | 11. | PBT | JAX | | 1068 | JE . | 1/1 | 8 | 1 |
| 31 | Pt. | 1-1 | JAX | APF | | 10/9 | JG, ELLEN SPENCER | 1/1 | 8 | |
| 31 | 16 | 11 | APF | BBI | 1 | 1070 | JE, CLIEN SPENCER | ili | ŭ | |
| 150 | | | PBI | TEB | | 1071 | IG, SORBLE BIRDLE | | 22 | |
| 6 | 11 | N | TEB | PBI | | | JE, GM, CT, SUPHIC BEDDLE, CUB, GLEN, TORDON, CELDING POUBEN | 1/1 | 26 | |
| 9 | и | V (| PBF | TEB | | 1073 | JE, GM, ET CLAEKE HAZEY JOEL PASHUM, I KKMALL, ALAN DEASHOWETZ, MANOY, I DVBS | 1/ | 24 | |
| 12 | 16 | VI | TGB | PBI | | 1074 | ICO, GM, IGGL PASHOOM, HIMON PASHOOM, GO, JOHN & MICH CAPING WATERWARE | 1/ | 26 | |
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| 20 | 11 | ** | PBI | TIST | | 104 | JG, GM, GT, GWEN DOLLAN BECK, STADEGE | 1/ | 20 | 100 |
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| 31 | N | 11 | APF | BBI | | 1070 | Ie, eller spencal | Vi | 4 | |
| 163 | 11 | 10 - | PAI | TEB | | 1071 | IG, SOPHIE BIPOLE | | 22 | |
| 6 | 11 | 1t | TEB | PBI | | 1072 | JE, GM, CT, SUPHIE BIDDLE, GVA, CHEM
TORROW, CELDINA DUBIEN | 1/1 | 26 | |
| 9 | u | U | PBI | TEB | | 1073 | STE GM, GT CLADER HATCH JOCK PASH WM
TECHNOLL, ALAN DEASH WITH, MANOY J DUDS | 1/ W | 24 | |
| 12 | 10 | VI | TEB | PBI | | 1074 | IC, GM, JOLL PASHEOW, LAWTON PASHEON, CT. JOM + MRS COTING WATERWARD | 1/ | 26 | |
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| 23 | G1159B | N908JE | PBI | TEB | | 1085 | TELEN DUBLY, NANNY, MALL | 1/1 | 22 | |
| 25 | 11 | , 11 | TEB | SAF | | 1086 | JE, EM, ET | 124 | 44 | |
| 27 | - 11 | 13 | SAF | PBI | 19 | Iden | IC, GM, DOUG SHOETTLE, GT | 1/0 | | |
| 31 | C 172 | N51898 | LNA | LND | 1 | - | CHECK OUT ENCESSNA TIL | 3/2 | 2 4 | CONFIDENTIAL DE 00004 |
| 31 | le . | 1.1 | LNA-PE | BE-LIVA | 1 | | CHRSS WALNER - 3 CMERCONCY
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| 16 | C421 | SEMUL DIE | | 1 | - | | RECURRENT TRAINDUC AT SIMCOM | - | 13 | |
| 17 | 44 | 1, | | () | | | EMERGENLY procepones | - | | |
| 13 | M | 12 | / | | | | INSTITUTIONS COMPETANCY CHECK | | | |
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| 6 | 11 | 1) | TEB | W47 | | inca | JE, 2 FEMALES (MEKEBY FACINI) | 1/ | 25 | |
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| 9 | 11 | 1) | BEO | TEB | | | JE, OLIVER SALHS, ROBEN | VI | 6 | |
| 9 | vi i | 10 | TEB | PBI | | | | SEP . | 4 | |
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| 17 | 611598 | N908JE | PBI | PAI | 1 | 10/18 | is, w | 1/1 | 1 | 6 | |
| 17 | C421 | N908GM | PBI | X21 | 0 | 1 | CHRIS WAGNER-PATSY, KRISTY, LAWRELL CONTROLLY APPROVED OPERATIONS | 1/1 | | 4 | |
| 17 | C421 | 11 | X21 | TIX | | 1 | same as above | Vi | | 1 | |
| 17 |) (| 3.1 | TIX | CRG | | | KRESTY ROCCURS, PATSY
SAL, CLEMBS, DESCENSS TURNS | Vi | | 6 | CONFIDENTIAL DR_00001 |
| 18 | 3.1 | 1, | CRG | LAL | 4 | | PATST RODGERS, KRIST | 1/1 | | 8 | |
| 18 | , bi | Y) | LAL | PAI | | | CHRIS WAGNER, LAURES, KRISTY POTTY | 1/1 | 1 | 1 | |
| 19 | G1159B | N908JE | PB1 | CMA | | 1099 | JE, CLASS HAZEY I FOMPLE | 1/1 | 2 | 0 | |
| 20 | 11 | Y n | CMH | ILUK | | 1100 | JG, GINGER, MANDY LANG | 1/1 | | 3 | |
| 20 | 7.1 | 11 | LUK | TEB | | 1101 | IE, GINGER, MANNY LANG | 1/1 | | 2 | |
| 24 | - 1.0 | | TEB | PBI | | 1,62 | JE, GM, COCOD BROWN, CS, LINDA | Vi | 2. | | |
| 25 | C/72 | NISRR | LNA-M | I-LAIA | | | CANCELLY PROCESSION - LASS | 4/4 | | 0 | |
| 25 | N | N | LNA | LNA | | | SHOKE SOFT, RESEISED TAKENS, THE STORES WHEN | 6/6 | | 8 | |
| 26 | 11 | 1.1 | LNA-PBI | | | | TRAFFEE PATTERM ENGICEDED | 5/5 | | 9 | |
| 26 | G1159B | N908JE | PBI | TEB | | 1103 | JC, GM, CT | 1/ | 2 | 3 | |
| MAY | VI. | 13 | TEB | PBI | | | SC, CM, ET, GLEN OWEN, JORPON, | 1/1 | 2. | | 1 |
| 1 | C 172 | NISRR | LMA PAT | -LNA WYUN | | | SHED & SUSS FEELD TO HE CHERLING LANDRESS TAS, ELTISS C COPCINEDIA | rillin | 1 | 2 | + |
| 3 | | N9085E | PBI | TEB | | 105 | JE, GM, GT, NAMER, CHENNEUS, CCLUM
JEKNAP, NAMEY, GWENNEUS WICKE | 1/ | 2 | 3 | |
| 5 | 11 | 11 | TCB | BCD | | 106 | JE, ROBLY | 1/1 | | | |
| 5 | 11 | V) | BED | TEB | - | | JE, ROBEH, STEVEN | . 1 | | 7 | . |
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| 7 | G1159B | NGOSJE | TEB | PBI | 1) 8 | TE, ET | | 23 | | |
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| 11 | 71 | Ti. | TIST | TEB & | 130 | JG, GM, CT, CLASE | HAZEL, CHOSE KHAZE | 37 | | |
| 15 | 11 | 11 | TEB | PBI | m | JE, MANDY C | LLISON 1/1 | 20 | | ONFIDENTIAL DR_00001 |
| 17 | 11 | 17 | PBI | TEB | in: | 76 | 1/4. | 24 | | |
| 18 | <i>b</i> . | 17 | TEB | MOW | M | GMIET, STANNON | HOALY MALE V | 16 | | T |
| 18 | V | 1) | MOW | SAF | br | GMETISE, SHON | West, ALPERTO | 2.5 | | T |
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| 47 | \1 | -: | 743 | 831 | ur | DE, MAHOY ELLESON | HELMALE VI | 22 | | 7 |
| 8 | 11 | 11 | PBI | TEB | M | JE, CHULADOUAN BEEL | KI GEMBLE | 2.5 | | <u>T.</u> |
| 12 | 15 | 13 | TEB | TEST | m | JE, GM, GT, CLADE H | AZELIMENSNIE 1/1 | 30 | | T |
| 15 | 11 | 3.1 | TEST | JFK | 112 | JE, GM, ET, CLASSIC | MOZCE, MOLDINGE / | 43 | | 1 |
| 18 | li. | Ti. | JFK | PBI | 1)2 | 36, GM, LYNN FLATAN | ILLA CRAILS | 20 | | |
| 2.1 | 1.1 | 15 | PBI | TEB | 112 | JE, RAUNGLISON, | CLD ROSDIZED / | 2.5 | | |
| 23 | 11 | A t | TEB | BED | 112 | JG. | ROXBURGH 1/1 | 7 | | |
| 23 |) , | 1/4 | BED | TEB | E TA | LIG. HENRY ROSOV | SKY DESPRE | 12 | | |
| 26 | 14. | 15 | TEB | PBI | 112 | JE, GM, MELENDA | LUNTZ CARY | 26 | | - 100
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| 5 | G1159B | N90836 | PBI | OXC | | 1126 | 26 | 1/ | 1 | 25 | | |
| 5 | 11 | 11 | OXC | TEB | 4 | 1127 | Je | 1/ | 1. | 4 | | |
| 0 | 11 | 11 | TEB | PBI | 10 | 1128 | JE, SOUNCE BIDDLE, 2 FORMALLS | 1/ | 1 | 23 | | |
| 2 | C 150. | 45563 | 21/€ | 7 Mg 1 | X | * | CIZO CHECK OUT DAN-CET | 2/ | 2 | 6 | | CONFIDENTIAL DR_00002 |
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| 13 | 11 | 11 | 16 | 1 | | 2 | MICH, FREEHOLD SIDE SUCH POSITIONS TO ENS | 3/ | 3 | 11 | | |
| 13 | Ne | *1 | li / | - | | | Emakeiner Contrants, warmen solvetts | 2 | 1 60 | 5 | | |
| 11 | 1/ | 13 | 11 | fix. | | 3,4 | TOWATION MAND, UY, UN, STEED TURNS, MEAH
FORWARD SURP, TINL BASIC BROWD PRUCOURUS | 4 | /4 | 10 | | |
| 16 | 16 | 74 | 16 | 11 | | 5 | AND GARRY OF TROOPER PATTERN, ALL STONES, CATT | e
Ass | 3/3 | 9 | | |
| דו | | 11 | | n | +=1 | 1 | TRUM, S-TROM, TROM, DASK ROOM PROCEDURES | | 12 | 11 | | |
| 17 | w | N45563 | 7/1 | Bam | | Sir | MCA. CONTROL TOWER OPERATIONS | 2 | | 8 | | |
| 17 | As. | 11 | BQM | JUY | | | ATES, GROWD COURSE, NORMAL TOYETTE, | 4/ | 14 | 8 | | |
| 17 | W | NTTBME | JVY | 214 | | 8 | FLIGHT AT VARIOUS ASPISEOUS FROM CRUSE TO
SIGN FLEGHT, FULL STOLLS, STOLLS PROMUNE CHOSE | U.S. | 5/5 | 12 | | |
| 179 | 16 | N | Tr. | 10 | | - | PRESIDENT PARK OFF + LANDENS, DESCENT USDIC- | C | | 8 | | |
| 8 | u | и | J 44 (rex) | EMS | | 19 | PILLYAGE, DOAD RECKONENS, DESKINSTE DING | _ 1 | 1 | 14 | | |
| 18 | - 11 | 11 | IMS | 277 | | 19 | UN, VORTROYCKEND, NOT POSSAGE, WIR RANDENS, LUNGLOSS IT DESCRIPT CROSSINGHIP LANGUAGE | 1 | 1 | 14 | | |
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| 3 | G1159B | N908JC | PBI | TEB | | 113 | JE CHILDIN CHMY | , RON | $\square \square$ | 2 | 5 | | |
| 4 | 17 | 11 | TEB | Hto | 1 | 1137 | IC, MCLOHER STORM | ics | 1/1 | | 7 | | 0 |
| 4 | 11 | 11. | HTO | OQU & | 1 | 1138 | NO PASSENGUES | | Wi | | 5 | 9 | |
| | 11 | 15 | OQU | TEB | | 1139 | JE | | Wi | 1 | (| | CONFIDENTIAL DR_00002 |
| 5 | 11 | 1.0 | TEB | BCO | b . | 1140 | Je | | 1/1 | | 8 | | |
| 5 | 1.1 | 33 | BED | MVY | | 1141 | JE | | 1/1 | | 5 | | |
| 5 | 1) | 1 e | MVY | TEB | | 1142 | JE | | 1/1 | 1 | 0 | | |
| 6 | ** | 13 | TEB | CMH | | 1193 | JE | | 1/1 | 1 | 3 | | |
| 6 | 14 | ,,, | CMH | TEB | | 1144 | JE | | 1/1 | . 1 | 3 | | |
| 7 | V. | 11 | TEB | TVC | | 1145 | JE, GM, ET, MCUZ | DUU FONZ | | | 8 | | |
| 11 | 11 | 11 | TVC | TGB | | 1146 | JE, GM, CT | | 1/1 | i | 5 | | |
| 13 | Įτ | 11 | TEB | PBI | | 1147 | JE, GM, ET, PAUL | ld Epstein | | 2 | 4 | | |
| 17 | n. | 11 | PBI | TEB | | 1198 | JE,GM, CT | 1 | 1/ | | 5 | | |
| 21 | 11 | , (| TEB | SAF | | | JG, GM, ET, ADAM | PERRY LAND | 1/1 | 3 | 3 | | |
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X COUNTRY CALLES BILL | | | | 9 | |
| 25 | G1159B | No10826 | ASE | VNY | | | | DOCYN BOUK | V | 1 | 9 | | |
| 29 | 11 | *(| VNT. | PBI | | 1152 | IC | 14.
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| 6 | G-1159B | N90856 | TEB | BED | MCC | JE RHUNDA SHERCE | 11/1 | (| - | | |
| 6 | AL. | 18 | BED | TEB | 1157 | TE, RHONDASHEARCAL + WESAND | 1 | - | 1 | | |
| 9 | ш | N | TEB | OCA / | 1168 | JG, GT, ADAM RERRYLANG | 1/1 | - | | | |
| 9 | r.t. | H. | DCA | PBI | 1169 | JE, GM, ET, AP | | 26 | | CONFIDENTIAL DE | R_00002 |
| 12 | W | N . | PBt | TEB | 1170 | JG,GM,GT, AR | 1/ | 23 | × | | _ |
| 15 | V | 13 | TEB | PBI | (17) | JE, SUPHIE BLOOLE | | 21 | | | |
| 19 | 11 | ŢĨ. | PBI | TEB | 1177 | JE, SOPHIE BLOOLE | 1/ | 22 | 1 | 1 3 | |
| 21 | V. | (1 | TEB | BED | | 24 | W | 1 | , | | |
| 21 | sit . | 11 | 360 | TEB | 1174 | IG, ALAN DERSHOWETZ | 1/1 | 8 | | | |
| 23 | ir | | TEB | -PBI | 1175 | JE, GM, ET, GWYNDOLTH BEGK. | 4 | 23 | | E Carlos E Carlos | |
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| 10 | 16 | 1.1 | PBI | TEB | 1175 | -IC | 1/ | 25 | | | |
| 14 | 11 | V) | TEB | TIST | 1179 | IG, GT, CLADE HAZEL, FRANCOIS | 1/1 | 32 | | | |
| 15" | 111 | Att: | TIST | PBI | 1140 | 36, GM, CLADRE HAZEL, ET, FRANCIS | 1/1 | 20 | | | |
| 16 | (II) | 11 | PBI | CMH | 1181 | IG, GM, GT, CLASTE HAZLA, GRANCUB | 1/1 | 20 | | | |
| 16 | \i | V | CMH | TEB | | JG, GM, ET, FRANCOIS | 1/ | 11 | | | |
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| 26 | G-1154B | N908JE | TIST | PBI | | 1134 | TEGM | 1/ | 25 | |
| 29 | 1.1 | 1.1 | PBI | TEB | | 185 | TE CA MOINT PRICELL LYNN GOLGHEN TO TOO SELL AND ROBER TO THE TOO SELL AND TOUR METERS THE TENENT TOUR TOUR TOUR TOUR TOUR TOUR TOUR TOU | فر | 25 | |
| NEG | 16 | 11 | TEB | PB1 | | 1186 | JC, ALEXER | V | 22 | |
| 3 | san | 11 | PBI | T.15T | | 187 | JG/ SCHICE BLOOLE | 1/1 | 23 | CONFIDENTIAL DR_00003 |
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| 4 | 10 | 11 | PBI | TCB | | 192 | RUGO MOUSE PROTEIN MANOS & | Vi | 22 | |
| 9 | | | TEB - | ABY- | | 143 | ta, alexis | 1/1 | 25 | |
| 10 | 1.7 | 1.1 | ABY | SAF | | | SC, ALLYUS | 12. | 30 | |
| 12 | 10 | All | SAY | VNY | | 195 | JE, ALLYIA | 1/ | 16 | |
| 15 | ¥t. | 11 | YNY | PBE | | 19/3 | JE, JEAN LUKE | | 42 | |
| 19 | 11 | 11 | PBI | TIST | | 197 | JG, GM, GT | 1/ | 211 | |
| 24 | 1.1 | 1-1 | TIST | TOB | | 1198 | JE, GM, ET, ULGA GILIPENALO | 1/1 | 36 | |
| 29 | 1,4 | 1. | TEB | DGL | | lidd | JOHN CT ME F. PS, CLEW, CELENT, | V | 23 | |
| 7,10 | 1.00113 | 31 11.11 | PMP - PB | - PMP | | 201 | SEE MANEILVERS MAKEL A. B | | | 1 2 |
| 100 | | N90676 | PBIL | TEB | 1 | 20 | SEIGNIET, PREVAICELEND, JORGAN, | 1/1 | 25 | * |
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| 10 | G1159B | | pat | BED | | 233 | IC, GM, CLAPPLE HAZEL, TICGALY GRAMZA, INCA DOCKRIGG CM, CLAPPLHOZEL, TEPAMY GRAMZA, INCA DOCKRIG | 1/1 | 2 3 | |
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| 47 | 611593 | NGOBJE | TEB | PBL | | | TGIGM, GT, GUYMDEREN BULLE, GLENDIFON
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| 29 | 11 | 11 | PBI | TIST | | 241 | TEIGNIET | 107 | | 3 | |
| 30 | 1.4 | 11 | TEST | PBI | | | JG, GM, GT | 1/1 | 2 | 8 | |
| 31 | 1 | 14 | PBI | SAF | _ | 100 | JEIGHI GT | 1/ | 2 | | |
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| 7 | 16 | Γ¢ | PBI | TEB | | | JG, GM, GT, TEZZAMY GRAMZIA | 12. | - | 4-11 | |
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| 9 | G1159B | N908JC | TEB | PBI | | 248 | JG,GM, GT | | 1 | 2 | 4 | | | | |
| 27 | 16 | V. | PBI | TEB | | 1249 | JE, ET, SHELLEY | | 1/1 | 2 | 5 | | | T | ANEIDENTIAL DD 00000 |
| 29 | u | 11 | TEB | BED | | | JE , | | 1/1 | | 9 | | | | ONFIDENTIAL DR_00003 |
| 29 | 14 | 11 | 360 | TEB | - | 1251 | JE | | | | 5 | | | | |
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| 22 | 10 | 16 | PBI | SAF | | 129 | JG, GM, ET | | VI | 3 | -(| | | | |
| 15 | A t | \ t | SAF | VNY | | 1257 | JE,GM, ET, LISA | , | Vi | 17 | | | | 7 | |
| 29 | 14: | W | VNY | OAK. | | 125% | JG, SHELLEY | 1 | 1/1 | , | 9 | | | - | |
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| 8 | 11 | 10 | PBI | TOB | | 263 | JE, ET, I TEMALE DAYS | 1/ | 2 | 4 | |
| 11 | I_{Δ} | la. | TEB | 637 | 1 | 261 | J6,09 | 1/1 | 2. | 7 | |
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| 7 | (I) | 14 | SAF | TEB | | 127 | IS CLAIRE, VICTORIA HATCH, ADOM | 1/ | 35 | | | The state of the s |
| 8 | 10 | J | TEB | CMH | 4 | 1278 | TE, CLARIC HAZEL | VI | 14 | | | |
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| 17 | 10 | 17 | TEB | PRI | | 1262 | CHATEL HAZEL | | 24 | | | |
| 19 | C-172 | NZ388L | LNA | LNA | | | CLOSEE WATEL
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| 20 | G-1159B | N90856 | PBI | TEB | | (253 | JG,GM, CLADAG, ET | VI | 25 | | | |
| 2 | 15 | 10 | TEB | PBI | | 1284 | JG, GTM | | 26 | | | |
| 23 | C-172 | N2388L | LNA- | FXE | | | ed amaso cpi renewal | Vi | 11 | | | |
| 23 | 11 | 15 | FXE | LNA | | | EDAMATO CET RENEWAL | 1/1 | 5 | | | |
| 25 | G-1159B | N908JE | PBI | TEST | | 1285 | Jegam, Ap, Shelly Darreson | 1/1 | 2,5 | | | |
| 26 | Ìι | 10 | TIST | TEB | | | JE, GM, AP, 5 HELLY HARRISON | 1/1 | 38 | 3 1 | | |
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| 9 | \(| 1.0 | TIST | PBI | | 1286 | TE, SHELLY LEWIS | 1/ | 26 | | | |
| 11 | 10 | · · · | PBI | SAF | | 1254 | 16 | 1/1 | 37 | | | |
| 12 | 10 | 4 | SAF | TEB | | 1290 | JE, SOPHIE BIDDLE | 1/ | 3 5 | | | |
| 14 | u | 11 | TEB | BED | | 1291 | Je, GM, AP, AUDRET RAIMBAULT, ET | VI | 7 | | | |
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| 16 | N | · · · | PBI | TIST | 129 | JG, GM, AUDREY RASMBAULT | 1/1 | 2 | | | | | |
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| 21 | 16 | M | TEB | PBI | | JG,GM, ET | 1/ | 2 | - | | | -CONF | FIDENTIAL DR_00003 |
| 27 | Vr | 11 | PBE | TEB | 129 | JG, GT, GWYNDOLTH BGCK, MR. BROWN | 1/ | 2 | | | | - 3 | |
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| 19 | 10 | 11 | TEB | PBF | 1309 | JE, MANOY GUISON, JEAN MEHRY | | | 5 | 1 | -1 | | |
| 22 | li | 11 | PBE | TIST | 1310 | JG, GM, CT, JCAN MENELL GATHY | | 2 | 2 | | | | |
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Aircraft Category...

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| 30 | M | 11 | TEB | SAF | 1313 JGGM, ET, BO, CLARG + VICTORIA HAZE | | 4 | 3 | - | 1 3 | | - |
| ٥٥٤ | ų | М | SAF | YNY | 1314 JE, GM, ET | | VI | 1 3 | 8 | | - c | ONFIDENTIAL DR_000034 |
| 4 | \t | Lr. | YNY | PBI | 1315 IG, ET | | 121 | L | 6 | + | | _ |
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| 12 | N | 11 | TEB | TIST | 1345 IG, AP, SOPHI | E, SHELLY | 121 | 3 | 3 | | - | - 44 |
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| 24 | 206L3 | NJZPH | PMP | PMP | 1326 DE, AP, SOY ADG, SHOULY LOWIS HOUGH PURES GUL ANTER, STREPEOPLES TOLL ROSEL HOLLURG EMERGENEY LAMBRACH, 180 FULL ANTER BOTH DESCRIPTION CHELLE STILLE PROPER STOPE NO HYDRIFLETS STILLE PROPER STOPE SCATTLENE WITH POWER CONFINED APLESS | | ., | 1 | 4 | | 115 | na di salah |
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| 19 | ti | 11 | PBI | TEB | | 369 | JE, 5 HELLEY LEMES | ROBORCH | 12. | 25 | | _ | |
| 19 | it. | 16 | TEB | SAF | | 1370 | IMALET, AP, SOPH, | CE, JASMENE | 1-1- | 411 | | | |
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| 51 | 10 | 11 | PBI | TEB | 0 | 332 | JE | VI | 25 | | | |
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| 21 |) (| 71 | TEB / | SAF | | 1386 | IC, GM, AP, JOE PAGANO, I FEMALE | | 42 | | | |
| 5 | N | 11 | SAF | VNY | | (387 | TE, KELLY SPAMM | VI | 18 | | | |
| 4 | 11 | 14 | VNY | TEB | | 1388 | JE, TIHANY GRAMZA | 1/ | 48 | | | |
| 29 | \ t | 11 | TEB | TIST | | 1389 | JE, PETER MARINO, I PERSON | VI | 36 | | | - Silver |
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57 | И | M | PFI | TEB | | 1291 | JE, GM, CT, 1 FAMPLE | 1/1 | 2.5 | | | |
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| 16 | 10 | 16 | SAF | VNY | | 1414 | JG,GM, ET | VI | 19 | | | |
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| 54 | 1ı | 1.8 | PBI | DEW | • | 14 23 | JE,GM | 1/1 | 2 | 7 | | | |
| | tr | 11 | DFW | AGQ | | 142:4 | JG, GM, RICARIO LEGORGITA | Vi | 1 | 8 | | | |
| | 4 | N. | ABQ | SAC | | 1425 | REPOSITION | 1/1 | 1 | 5 | | | |
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| | i. | 11 | EGGW | EGYM | | 1429 | JG,GM, KGLLY SPAMM, TOM PRETZ KER
I CHARHAM AERFORCE MOSE) | | | 5 | | | |
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| | k | 10 | CYGX | PBI | 1 0 | 432 | JG, GMET, KELLY SPAMA | | 4 | - | | | 4 1 |
| 8] | 10 | 16 | PBI | TEB | | 433 | JC, GM, GT, VIRGINIA | VI | 2 | 6 | | | 2 |
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| 6 | Vz | W | 155 | PBE | 10 | 191 | 36 CM, AP, VR, BX, C-WENDOLYN BECK | 1/1 | 27 | | |
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| 16 | (+ | M | MCI | 27 K | 10 | | JONATHAN MANN-IFE CROSS COUNTRY
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| 3 | 10 | v.t. | PBI | TIST | 1 | 510 | JG, VERGINER ROBERTS, BAM KYCUKKONU | V | 2 | 4 | | lle.v. | | |
| 5 | 14 . | 1.4 | TIST | TEB | 1 | 531 | Je, VR, BK | 1/1 | | 8 | | | | CONCIDENTIAL DD 00004 |
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| 15 |) r | 76 | TEB | PBI | 1 | 5% | JE,GM, STHER DAN, CAROLLY, VECENAL | | 2 | 3 | | | | |
| 18 |) c | 72 | PBI | TEB | 15 | 517 | JG, C.M. IKEMAK | 1/1 | 2 | 5 | | | | |
| 22. | 11 | 11 | TEB | LEPO | 1 | 518 | | VI | 7 | 0 | | | | |
| 23 | ١٤ | N.E. | LAPO | LAMN | 14 | RE | JG,GM, IRGMALE | Vi | | 2 | | | | |
| 25 | 10 | 3.1 | LEMN | LIML | 16 | | JE, GM, I KEMME | 1/1 | | 7 | | | | |
| 26 | 14 | \r · | LFML | LEPB | \5 | 721 | JC,GM | 1/1 | 1 | 4 | | | | |
| 28 | 11 | (, | LFPB | LPA2 | 18 | 522 | JE,GM, ET, ED TUTTLG | 1/1 | 3 | 9 | | | | 3 . |
| 28 | 16 | 11 | LPAZ | TEST | 15 | 523 | JG,GM ET, GO TUTTLE | 10.1 | 1 , 1 | 0 | | | | |
| 345 | 11 | lx . | TIST | PBI | 1 1 | | JG, AP, UR, I FEMALL | 1/1 | 2 | 5 | | | | |
| 8 | 15 | 10 | PBI | TEB | ls | 525 | IGGM ET, AP, VR, SHERDON CHEVRE | De / | 2 | 7 | | | | |
| 11_ | ¥ C | 11 | TEB | CPS | 15 | 126 | JG, GM, CT, VR BOXBURGH | | 2 | 3 | | | | |
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| 28 | 31 | N.C | TIST | PBI | | 1531 | JE, VIAGENEM RUBERTS | 1/1 | 26 | EON | FIDENTIAL DR_00004 |
| 29 | j.* | ч | PBI | 158 | 6 | 1532 | 34 | VI | 25 | 1 1 5 | Xi. |
| 29 | t.e. | 1¢ | ISP | TEB | | 1537 | Const. | 1/ | | | |
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| 3 | B-727-31 | N90856 | JAX | PBI | | | 4 | 14/4 | | | |
| 4 | B-727-100 | PAPAM
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| 5 | (+1159B | NGOGJE | PBT | TEB | | 525 | JEGM, DP, CT, TAYLOR | 1/1 | 76 | + 1 | |
| 5 | 1 6 | 11 | TOB | PBI | | 153 | 1 48:4. | 1/1 | 23 | · · · · · · · · · · · · · · · · · · | |
| 7 | B-727-31 | N908JC | PBE | LGA | | Ī | M FXC
Quio van | 1/1 | 16 | 1. | |
| 7 | ve | 1.1 | LGA | ABQ | | 2 | JG,GM,ET,AT, 2 FEMOLES | 17. | 40 | | |
| 14 | C-421B | N908GM | PBI | JAN | | | TONATHAN MAND - ENGTHUMENT
COMPETANCY CHECK SASTOGACTORY | 171 | 39 | | |
| 14 | 1. | 16 | JAN | AMA | | | TON ATHAM MANO-LOA WETH GS | 1/1 | 01 | | |
| 14 | M | 16 | AMA | 869 | | | DNASHAN MAND- | 17 | 36 | - 3 | |
| 15 | 1. | Tx. | 868 | ABQ | | | TONOTHAN MAND-HIGH CENSIN' | iti | | | |
| 15 | i | 1.1 | ABO | 24.60 | | | TONATHEN MAND-SHORT FELD
MANDER OF GRAPTERS | 1/1 | 2 | | |
| 16 | 13-727-31 | N908JC | ABa | PBF | | 4 | JEGG, ET, GP, FLOWE, JONANATIMY MANO | 1/ | 38 | | |
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| 24 | 11 | 11 | HPN | PBI | | | | 11/ | 2 4 | |
| 27 | 1. | u | PBI | Mati | 1 | 9 | JE,GM, BK | 11/ | | |
| 29 | 13 | 11 | HPN | 1751 | 1 | 10 | 36,GM,GT,AP,DK | 1// | 26 | CONFIDENTIAL DR_000049 |
| 30 | G-115918 | NAOOLLA | PBI | PBI | | 1- | 3 FLO MORONCHES LANCEY SAGESTY POLOS VISCOSICE | 3/3 | 37 | BON BENTAL BIL COODS |
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| 6 | 14 | 1.1 | HPN. | PBI | | 12 | JEIGH, ET, EK, I FEMOLE | 1/1 | 2 7 | |
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SCT | u | 11 | HPN | PBI | - | 20 | JG, KS, PAUA EPSSEIN | | | |
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| 8 | N(| 9 | ABa | HPN | | | JE, GMISKIZ FEMALE | 1 | 40 1 | |
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| 15 | - 53 | N39558 | LNA-BCT | -LNA | . 1 | 1 | LARRY MURRISIN-BER SATISFACTORY
STAUS, MCA, STOCK TURNS, EMERGENCY CANDON | 14/ | 4 | 1 3 | | |
| 9 | B-727-31 | N908JE | | LCQ & | | 24 | NO PASSET GERS | V | 1 | 5 | | |
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| 1 | 11 | N | TEB | PBI | * | 1534 | JE SARAH KEUGN
IB,CM, SK, LARRY, STEVE, I FOMALL | | A CONTRACT | 23 | 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 | |
| 15 | 11 | 11 | PBI | TEB | | 1540 | IL, CM, SX, LARRY, STEVE, I FOMALL | 1/ | | 24 | | |
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| 1 | ţt | 11 | BED | TEB . | | 1542 | JE, DONNIL | | | 10 | | |
| 8 | 10 | 51 | TEB | TIST | | 1543 | JE, GM, OP, SK, 2 FEMBLES | | | 35 | | |
| 23 | Vć | 11 | TFST | TEB | | 1544 | IGGM, AP, SK, SKEEPINGERSON | 11 | 1 | 40 | | |
| 6 | | 11 | 飞 | PBF | | 1545 | TECTIST SHERIAM CEUSEY, 24CMUS
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TEISAKAN KELLEY, JULK | | | 76 | | |
| 30 | 16 | 3.1 | PBI | LCG | | 1546 | JEISAKAN KELLEP, JULK | 1/ | 1 | 10 | | |
| 30 | 14 | 18 | LCQ | TEB | | 1547 | JE, SK, JUCKE | 1/ | 1 | 20 | | |
| 3 | | 31 | TEB | SAF | | 1548 | JG,GM, SK | 1/ | i | 40 | | |
| 5 | ic | n, | SAF | ASC- | | 1549 | JE, GM, SK | 1/ | 1 | 8 | | |
| 5 | ١٠ . | i. | ASE | PBI | | 1550 | JG,GM, SK | 1/ | | 37 | | |
| 5 5 5 | 16 | 1. | PBI | CMH | | 1551 | JE, SK BELLA WEYNERS GUNGRAL | 1/ | | 24 | l i | |
| 6 | -11 | н | CMH | TEB | | 1552 | JG/SK | | 1 | 14 | | |
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| 12_ |) s | V t | PBI | TEB | | CES | TERM, AP JUGL PASHOW, | 11/ | 25 | | | To the second se |
| 15 | J, | 15 + | TEB | PBI | | 153 | JGGM SAVAY XELLEY, MCLINAMUM | The same | 25 | | | |
| 17 | 13-727-31 | N908JE | LCQ | PBI . | | 25 | | 1/1 | 9 9 | | | ONEIDENTIAL DE COCCE |
| 18 | 1.6 | 3 ' | PBI | CYQX | 1 | 26 | SG,GM,SX | 11 | 43 | | | ONFIDENTIAL DR_00005 |
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| 23 | 1.1 | 14 | LEPB | LIML | | 28 | JEIGM, SK | 1/1 | 12 | | | and the second |
| 23 |) (| 7.0 | LEML | LIPR | | 29 | IE, COMEDWARDS | 1/1 | 8 | | | |
| 23 | 10 | ١, | LIPR | LIML | | | JE, EDWARDU | Wi | q | | | |
| 24 | \c | 11 | LEML | EGGW | | 31 | JG, GM, SK | | 17 | | | |
| | V _L | 1.0 | EGGW | HPN, | | 32 | JE,GM, SK | | 79 | | | |
| 30 | 1. | , Y. | HBN | PBI | | 33 | JG, SK, GWEMPOLIN BECK, JUEL PASYLY | 11/ | 25 | | | |
| DEC | 11/ | ,· | PBI | ISA | | 34 | JE,SK | 11/ | 25 | | 1 | |
| 4 | 11 | /14 - | TSP | PASI | | 35 | JE, AP | 11 | 27 | | 1 | 1 |
| 9 | 10 |) re / | PBE | TIST | | 26 | JG, GM, AP, I FEMPLE | IZ | 2/2 | | | |
| 13 | 11 | 111 | TEST | HAPN | | 37 | JEGM, SK, AF, LEON TENTON MYER JEST JULIEN LEVES / CHONGE FOR MYER JEST JAMES IMPORT | 1/ | 40 | | | 79 |
| 15 | W | 16 | HPM | CMY | | 38 | JE, SHEWERLEWAS/2 FERNOLGS IMPLIE | 16 | 15 | | | |
| 16 | le . | 10 | EMH | PBF | | 39 | 3E / V C | | 121 | | | a) or o |
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| 13 | 1 x | 11 | 7757 | HPN | | | JEGM, SK, AP, GT, CW, CP | V | Ÿ0 | - | |
| 15 | 1/ | 1.1 | HPN | CMIX | | 38 | JG, SL, 2 SEMPLES, 2 MALCI | 1/ | 15 | - | |
| 16 | 14 | U | CMH | PBE | | 34 | 7K | | 21 | | |
| 17 | (,t | 3. | PBE | TEST | | 40 | JG,GM,SK, I FEMALO | 1/1 | 26 | | |
| 26 | 1.1 | 1.1 | TIST | TLPL | | 41 | JG,GM,SK,AP, FLIGUR PERRYLANGER BOB
AREXCH | 1). | 1 1 | | |
| 26 | 1.0 | 1.1 | TLPL | PBI | | 42 | JE, GM, SK, AP, FLENE PERFUNIA BOB | 0/0 | 36 | | |
| 302 | 1.0 | 11 | PBI | TIST | | 43 | JG,GM,APSK,1 FENALL | 100 | 2 4 | | |
| 344 | 1, | 1 t | TEST | EWR | | 44 | SEMON LUNGS MLEXED WALLDOWN, | 1/ | 41 | - 11 | |
| 10 | 1c | M | EWR | POL | | | JG, CM, ROCHE, WARTEN, MANGARES, | VI | 2.0 | | |
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| 14 | B-727-31 | N90856 | PBI | LGA | | 46 | JE GM | 1/ | 22 | - 1- | |
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| 5 | B-727-31 | N908JE | LGA | BED | | 42 | Je | 1/1 | 7 | | |
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| 7 | W | 1.0 | HPN | TIST | 1 | 49 | JOANNY, JEGMANY LOREZ, | | .34 | | |
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| 5 | M: | 10 | PBI | HPN | 2 | 51 | JEGMSY, AP, CENDY LOPEZ | 1/ | 25 | | |
| 5 |) (| 71 | HPN | PBI | | 52 | JEKEM AS AR ALBERT PENTS ARM 3800 JEEP STEELER SELECTION 3 | acr | 27 | | |
| 3 | 1.1 | 11 | PBI / | TIST | | 53 | JEEMAND SK, CO TUTTLE, INALE, | 1/ | 24 | | |
| 0 | 10 | 11 | TIST | JEK | | 54 | IG, GM, SK, AP, GO TUTTLE, CENTON LARD | 1/ | 37 | | |
| 200 | 12 | 1. | JEK | PBI | | 55 | JE, GM, SK, AP, IMALG, IFGMALL | 1/1 | 28 | | |
| 1 | re- | 11 | PBI | MEA | | 56 | JE, SK, AP | | 3 | | |
| 1 | 16 | 16 | MEA | HPN | | 57 | 2 MANGS I FEMOUR TO GM, SK, BP | | 26 | | |
| 1 | 1.4 | t.c. | HPN | LEPB | | 58 | BILL CILLTON & SECRET SCRUES,
2 MAY SK, BY, FLENT PERRYLSHE,
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| 3 | ¥τ | 1 x | LEPB | ESSA | | 59 | JE,5K | VI | 2_ 2 | | |
| 4 | 7, | 17 | ESSA | LEML | | 60 | JG, SK | 1/ | 24 | | |
| 5 | γt | 5.0 | LIML. | EGGW | | 61 | IG, SK | | 18 | | |
| 5 | ,) (| 11 | EGGW | BGR | | 62 | JG, GM, SK | € . | 72 | | |
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| 8 | 6-11590 | N90956 | PBI | 984 | | | JE | 1/1 | 14 | | |
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| 6 | <u> </u> | y t | ABY | JEK | - 4 | LS | 3G GM, SK, GLOW DUBBY, 2 SCHALLE | | 2 | | | |
| 0 | xx. | 1.0 | JFK | MRY | 1 | (-A | STENSE DENGEL NEWS LAYBORNE, KIT LAYBOT | 1/1 | 50 | | | |
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| 3 | 11 | 11 | MRY | VN9 | 2 | 67 | JE, SK, KELDY BOVENA, MENO Y SEM 21 | KG 1/1 | SW-10, 1 | KEUNGED E | 29K | |
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| 5 | 6-1199B | NAPPLE | TER PBE | ABATER | 1 | | ROGER, SCIANGES REPRESE, PRICESE, PRICESE, | 1/1 | | 4 | | |
| 5 | 10 | 37 | TGB | ABQ | | 192 | | 1/1 | 25 | | - 1 | |
| 5 | 13-727-31 | N90856 | JAX | PBI | | 71 | BCHCCK | 17 | | 1-+ | | |
| 2 | B-727-200 | SEMULASOR | MED | MEA | | | STEEP TURFS, STAUS, HOLDENCY | 1/ [| 50 | | | |
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| | i ve | C.V. | 1(| 1.6 | | - | EMERICAL POSCENT, RTO, UNUSUAL ATTITUDES GIVENE GOSCUPES A ESSED MARE EMERICAL POSCENTS 2 CANCENTS OUT | ncv | 20 | | | |
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| , | B-727-31 | N90856 | TIST | JFK | | 77 | TE, GM, SK, AN, CENOY, 2 REMAILS | 17 | 20 | | | |
| 1 | 14 | VC. | JFK | PBI | 1 | 72 | JE, SK, ICE PACANO, TULE, TODO | ./ | 41 | | | |
| 1 | . 10 | 11 | PBI | JFK | | 74 | TE, SK, JOE PAGENO, JULEE, TOAP, | | 25 | | | |
| | 1c | 11 | JFK | EGGW | | 75 | BELL CLENTON, DOUG BANDS, 3 SECRES SCENCE | 1/ | 26 | | | |
| + | K | 11 | EGGW | JFK | \vdash | 75 | BELL CLENTON, DOUG BANDS, 3 SECRES SCRUCE
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| 1 | W | 1.1 | JFK | PBT | \vdash | 76 | BILL CLENTON, DOUG MANDS, 10 SCIENT SOLE
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I'C, NICOLE SUMERMANN SEADING | | 26 | | | |

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| 23 | 16 | 14 | lc _ | 10 | | | APO FERG, GATTERY START, CROSTILLOS | | | 0 | . 1 | |
| 24 | N. | v | 10 | 1 | | | STAPLE PLEDIE FERD, ENGINE SHATTON A | | 2 | 5 | | |
| 25 | le . | : ' (| 10 | 16 | | 1 | TWO GENERATORS EMPLOYED TWO ENGENES THE FORENCE FIRE FORE LOWORL PRESSURE | LOUS I MET | 2 | 0 | | |
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| 29 | 13-727-31 | N90856 | PBI | ABQ | | 90 | JE, GM, SIC PERGROSHOW | | 4 | | | |
| MARC. | Ve | 11 | ABQ | JFK | | | JE,GM,SK | 11 | 3 | | | |
| 4 | ı. | 14 | JFK. | PBI | | 92 | JE, SHELLY LEWIS | 1/1 | 2 | | | |
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121 | NOWGEM | C-421B | PBI | FXC | | A. | ON A BRATHERS QUE PITEN | 1/1. | | (| a | | | |
| 11 | N908JE | B-727-31 | PBIL | JFK | 0 | 93 | JG, SK | VI | | 25 | , 1 | | T | |
| 13 | B-727-31 | N908JE | JEK | LFPB | 6 | 94 | JE,GM,SK | 1 / | 1 | New York | | | | NEIDENTIAL DO COCCE |
| c / | 1.5 | 14 | LFFG | LEPE | 11 | 95 | Reposition | | ů, | 7 2 | | | CO | NFIDENTIAL DR_00005 |
| 5 | 1.5 | 18 | LEPG | EGGW | - | 96 | JG,GM,SK | |) | 8 | | | T | |
| 16 | 11 | x t | EGGW | LEMN | 9 | 41 | JEIGMSK | Vi | | 1 8 | | | | |
| 19 | 11 | 1, | LFMN / | UNNT | | 98 | JE, CM, SK | 1/ | | 6 | | | | |
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| 22 | 14 | 1.1 | RITA | MAKIN | | 100 | TE, GM, SK, PRESTOCK BLL CLENTON, AND MELLS, DOUB BOND, JONECH, TESSICO PETE SANC DO 1000 PETE | Nº | • | 40 | | | | X/ |
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27 | 1 1 | 1.0 | VTBD | WBSB | | 104 | SAME ASABOVE DEFEN | לכים | | 26 | | | | |
| 27 | ١, | 16 | WBSB | WERR | | 165 | JEIGMISK RATION | 01/1 | | 21 | | | | |
| 29 | 15 | 11 | WRER. | VCEI | | 106 | JE, GM, SK RETTLE RETTLE | 3 | | 52 | | | | |
| 29 | 11 | · · · · · · | VCBI | OMOB | | 107 | JEGMISK RONKA'S | | | 44 | | | | |
| 30 | (, | l i | OMDB | LEPB | | 108 | JG,GM.SK ROTTE | d | | 3 8 | | | | |
| 31 | Li | 11 | LFPB | EGGW | | 109 | KGM, SK RATAGOR | | | 10 | | | 1 | |
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| 202 | | | From | То | FIOMI | NU. | Maneuvers, Endorsements | | of Landings | ARRIANO GL | *100 | HGLECOPI | | | |
| 8 | B-727-314 | N908JE | EIDW | JFK | | 148 | JON SX | | W. | 69 | L PCIC | 7 | | | |
| E | 13 | 11 | JFK. | PBI | 49 | HZ. | JE, SK. | | V | 23 | | | | | |
| 2 | G-1159B | N98958 | PBI | POI . | 1 | 1557 | GMU FLIGHT-SEAN RELEY, | SKEE ORDER | 1/ | 27 | | | | | |
| 4 | 13-727-914 | N908JE | PBI | Bos | 1 | 113 | REPOSETTON | JAN POPIGE | 1/1 | 0 (| | | FIDENTIAL | _ DR_00005 | 57 |
| 4 | vi | N | Bos | TIST | - | 114 | JE, SK, CEMOY LOPEZ, LOWRE | - Haracis | | 37 | | | | | |
| b | 1 4 | 1.6 | TIST | JFK | | 115 | JE,GM,SK,CEMPY LOPEZ, L | MESTAN | 1/ | 38 | - | | | | |
| 9 | G-1159B | N90956 | PBI | TEB | | CKG | REPOSITION | RATHUGA | 1/1 | 32 | - | | | | |
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| 3 | 11 | n | TEB | PBF | | 574 | ACPOSESDON | ROTHGUT
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| 7 | B-727-318 | NYOUTE | JFK | LEPB | | 116 | TEGMSK, OP, FREDERE FLEXI | (A) | 7. | 25 | -H | | | | |
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| 13 | B-727-314 | N90856 | LFMN | GMTT | 19 | | JOMISK, AP, CENDY LOPGE | | 2 | | | | 1 | |
| 13 | 14 | ٧١ | GMTT | GMMC | 1 | | SE, GM, SK, CL, AP | | | 7 | | | | |
| 13. | 1.5 | 11 | GMME | LPAZ. | VI | 2.2 | JEJGMISKIAPCL, PROSDENT CLENTON
DOUG DONOS MEKG, & SECRET SERVILLE | | 24 | | | | _ co | NFIDENTIAL DR_00005 |
| 13 | W | . (| LPA2 | JEK | 1 | 23 | BOUG BANK MIKE, & SCENER SCRUCCENTEN | | 5 9 | 3 | | | | |
| 18 | J. | 16 | JFK. | PBI | 13 | 24 | IG, SHELLEY LEWIS, 2 PEMBLES | | 2: | 2 | | | | |
| 19 | , v | ١. | PBI | JAX | 1: | 25 | KARSTY ROBGERS GREG HOLDORT,
ALYSSA HOLDORT - C CHEEK | | 10 |) | | | | × |
| 4 | 6-11593 | NGOGJE | PBT | WAY | 10 | 563 | JE, I FEMOLG | | 26 | 3 | | | | |
| 4 | 1 e | 11 | MVY | BED | 15 | | 36,1 Kemala | | | / | | | | n. |
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| 5 | 14 | 10 | TEB | SAF | 19 | 100 | IE, SK, 2 FEMALLS | 1/1 | 30 | | | | | * |
| 6 | 4-172XP | N7395P | AGG | ACG | | | 172 CHECK OUT | 3/3 | · · | 1 | | | | (1) |
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| 15 | B-727-314 | N908IE | XAZ | JAX | 1: | 20 | C-CHELL FLEGHT 1851 ROTHERS | 1/1 | | | | | | |
| 16 | 16 | 10 | JAX. | PBI | | | RETURN FROM C-CHECK PETE | | | | Ш | | | |
| 17 | G1159-B | N9095G | SAF | TEB | 15 | 59 | SE GMISK CEMPT LOPEZ, VERGENER ROBIN | TS, PANEDIN | 3 | | | | | |
| 18 | N, | 1(| TEB | PBF | 15 | 30 | SQUEREETAP ROBLETA, I REMOVE | 70.
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| 21 | B-727-314 | N908TE | PBI | TEST | 1: | 28 | DE, 5 HELLEY LOWIS | | 2.5 | | | | | ₽ |
| 25 | 11 | As | TIST | ZEK | 13 | 29 | JG, SK | 1/1 | - | 2 | | | | |
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| 31 | B-727-314 | NOOSTE | LEPB | EGBB | | 131 | JG NECOLE JUNKERMANN | 1/1 | 10 | |
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| 3 | 1¢ | . 16 | LEPB | JFK | 1 | 133 | JE, SK CENDY LUPEZ, | 1/1 | 75 | |
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| 9 | G-1159B | 11 | TEB | BER | | 159 | Je, sheller land | 1/1 | 9 | |
| 9 | 10 | u | BED | TEB | | 159 | JE, SHELLET LEINTS | | 9 | |
| 0 | in | v | TEB (| TIST | | 1545 | JE, SHELLEY LEWES, ANDREA | | 3 8 | |
| 5 | 14 | 11 | TEST \ | POI | | 1596 | IG, SK, DAANE FLEETUNDOD | WI | 26 | |
| 41 | B-727-31A | NGOSTE | JEK | LPA2 | | 136 | RACESTRONT WELLAM S. CLEW DW. MEST | 10 | 52 | |
| 12 | 16 | 16 | LPA2 | DGAA | | 13 | TOWN A AND DAVED SLOWS TEM KENNEY | 1 | 57 | |
| 23 | 16 | 11 | BEAR | DNAA | | 138 | GREE NOUNCES, RUMNEYS LASER CASEY FUNDAMENTAL SMETH | 79/ | 17. | |
| 24 | 14 | 16 | DNAA | HRYR. | | 139 | SAME AS ABOVE LESS RUN DORRELLE | | 40 | |
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| 27 | W | 17 | FACT | FA75 | | 142 | SAME AS ABOVE LESS JE, CM.S.K., CL. | | 21 | |
| 28 | i e | 1.1 | FAJS | FACT | | 143 | PRA MAGAZENON | | 20 | |
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| 2 | 11 | 1.4 | LFPB | JFK " | | 148 | JOYETHE YEAR PROPER | A METROLEZH | / | 8 | | | NFIDENTIAL DR_00006 |
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| 5 | 6-11598 | NOOPSE | PBI | 76B | | 1307 | SEISK, AMPLEP, READ, | FE MOSE | | 2 | 3 | | |
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| 19 <u>-</u> | and Model | Identification Mark | From | To | HOWN | NO. | Maneuvers, Endorsements | 0, 2,3 | non go | 92:15314 | Chille | 11.:14 | |
| 4 | B727-31H | NAUSTO | PBL | TEST | | 1 | RESERVEN | 112 | 1 | 24 | | | |
| 18 | vt. | 1.1 | TIST | LP92- | | 130 | END MENNER METERS | USTICH, | | 56 | | | |
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| 22 | M | 71 | EKCH | UUWW | - | 160 | ACK WOK ANDRES WELL | 2-1-11 | | 25 | | | |
| 24 | 10 | 11 | Junu | VLLI | | 161 | JEK-M SX, ANDERD MERCH | TERM 1 | 4 | 14 | | | |
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| 2.4 | 11 |) t. | EINN | J.F.K. | | 163 | TE, EMA JE, ANDRED METR | WEICH | | 126 | | | |
| 26 | 10 | A.f. | JEK | COL | | 164 | TE SK PLYAN DENNIE MACHON | al-Lieconsul, | | 27 | | _ | |
| OSE. | 1.6 | 11 | FBI | JEK | | 165 | TEVANT THE TOPP 3 MORE | s. 466ATGO | | 2.5 | | | |
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| 13 | B-727-314 | NYCHIC | PBI | :JFK | A.S | 1 | TICKEMSK MACALL BLACKER, VALSON
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| 5 | l (| ١٤ . | TIST | PRI | | 172 | JEICHISK, RYAN DISONG, MUHIUS-LIKEN | nti | 28 | | | |
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| 7 | 30 |) (| JFK | PBI | | 176 | A SK MAC LE BLACKOM | 1/1 | 28 | | | |
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| 17 | V. | N | LAPB | CYQX | | 160 | TO CAN SE, MOSALE BLOWNERS PROPERTY ON THE TOTAL IN THE PROPERTY BRITAIN WHITE AT A MESTAGE TO SEE T | 国際 | 55 | _ | | 1 |
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| 23 | ι | 11 | YBE | JFK | | 182 | TE DEDORDH ALBERTY, SULFERSE BRUDON | · VI | 20 | | | |
| 2.5 | · R | V ₁ | JEK | MRY | | 183 | TIG SK CHOLDING DAVISH DEIN KAMEN | lat / | 6 3 | | | |
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| 5_ | 14 | 10 | JFK | PBI | | 186 | JEMOGRE BLACHEN | | 2 | 8 | | | | 3 |
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| , | 1. | 11 | GUAL | LEPB | | 91 | MAGGLE BLACHON | 1/1 | 5 | 2 | | | | |
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| 3 | (z-1159B | N969.56 | CMH | TEB | | 1627 | TWITE WE'ZE'WE'ZE BURNINGS | 14 | 1 | 2 | | | T . | |
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| 4 | 14 | Ne | TEB | MIV | 1 | 162 | I'M GAKES WARREN | | | 8 | 11 | | + C | ONFIDENTIAL DR_00006 |
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| 7 | к |) r | TEB | PBI | 4 | 1630 | JEGY, BT, GM (BARY MOSSOW) | 11000 | 2 | 4 | | | | |
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| 16 | 10 | . 16 | VNY | TEB | | 1635 | -IG/SX | 1/ | Ч | (2) | | | | |
| 3 | 11 | 10 | +GB | IAO | | 1636 | ANDRED METROULTER, SK, BT | | | 9 | | | | |
| 3 | W | NC . | LAD | PBE | | | 34,AM,SX,BT | | 2 | \(| | | T | |
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| 2 | 15 | N4916M | 7237 | TIST | | | LARRY USSESKE | | | | | | 14 | |
| 2 | B-727-31H | N968JE | TIST | ZEX | | 195 | JE, P.M. J.K., BT, TEALS PAVIES, TO THE MODERN COPEN OF B. CORELAND PACIFIC | io. | 3 | 7 | | | Τ' | |
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| | 13-727-314 | N908TE | LIRA | LEMO | - | 199 | JE, AM, JCAN LUE DRUNGL, EM, SK | | 22 | | | |
| .1 | 11 | 11 | LEMO | JFK | | 190 | 25 JEUNING WANTE (SEE BATHER) | | 76 | | | |
| 2 | ve | 11 | JFK | PBI | 1 | 200 | BROUT TENDAL | 1/1 | 26 | | | |
| | 6-11598 | NGOGJE | PBI | TEB | Y | 11.76 | JE, BT, JULIC | V | 25 | | | CONFIDENTIAL DR_00006 |
| | 11 | 11 | TEB | TIST | 7, | 1,20 | 34, AM, 5%, 137 | | 46 | | | |
| 100 | 16 | 13 | TIST | TEB | | 1640 | 36/44, 21/ B) | VI | 38 | | | · 持 |
| | BHT-407 | NUGIGM | TEST | 1555 | | | JE, MM, SK, VALDONEOTREM | | | | | 14.3 |
| 7 | G-1159B | N909JE | TIST | PBI | | 1641 | JC, AM, OK, VC | | 2.5 | | | |
| 1 | 11 | 11 | PBI | TEB | | 1642 | JE, AM, SK | 1/1 | 26 | | | |
| 4 | YV | 11 | TEB | CYUL | | 1643 | ZE DENT BAND, GM | | | | | |
| 4 | 11 | 11 | CYUL | PBI | | 1641 | JG, DUL BOND, GM | | 30 | | | |
| | 13-727-314 | N908JE | PBI | MYM | | 201 | JE, AM, UC, SK BOODERS | 1 | 8 | | | |
| 7 | V(| 10 | MYNN | オチド | | 202 | JC, AM, GM, SK, VC BOBBELLE | * | 26 | | | |
| 9 | 10 | 11 | てたから | JFX. | | 206 | TE, BT SWAN HAMPLEY, THE CHARGE TE, BT, FABREAME PACHEC TE, BT, FR, SK, SH | | 39 | | | |
| 9 | K | И | JFK_ | PBI | | 207 | JE BT, FABREAME PACHED | V | 24 | | | No. of the last |
| | 6-11598 | N90956 | PBI | TEB | | 1645 | JOBT, FR, SK, SH | 11/1 | 26 | | | |
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51 | 0-727-314 | N908TF | JFK | PBT | 21 | BAJAM MYLENS,
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| 13 | 6-11598 | N909JE | | TEB | 16 | The state of the s | | 1/1 | 9 | 11- | - |
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| 31 | B-727-314 | N90856 | PBI | JAX | 2 | 9 | | | 9 | +1- | - - |
| 31 | 6-115913 | N90936 | | TEB | | 34, BT, GM, SH, | | | 2 5 | ++- | |
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| 22 | 11 | N909.56 | PBF | 7757 | 16 | 2 TE, BT, NAOLA, SK, | 204798 | VI | 26 | ++ | |
| 26 | 13-727-200 | SAMULATOR | | MIA | | Exist May lee May 1 | | 12 | 431. | ++- | |
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| 18 | 13-727-200 | SEMULATOR | MIA | MIR | | | RCY DARZANG - GARMENTE | | | GLEDGE | HELL | 14 |
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| 29 | G-1159B | N90956 | PBI | TEB . | 60 | 1664 | GM | -12 | 127 | | - | - - |
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| 16 | 10 | NC * | TEB | PBI | | 672 | JG, BT, AM, SK | | 26 | | | |
| 19 | 11 | 15 | PBI | TEB | | 673 | JERRY GOLDSMETH LEARY REXIDERS | V/I | 27 | - | | |
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| | | 2.51 | PRESERVIT CLENTON TO | CALL CONTROL | | | | | |
| | - | 232 | SE, AM, 5K | At British 199 | 1/ | | | | |
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ZBAA PANC 231
PANC JFK 233
JFK PBI 234
PBI JFK 235
JFK CMH 236 | ESSA ENGM 227 TE, AM, CM, 3K CNOM UNNT 228 TE, AM, CM, 3K, DOWNER UNNT VHAH 229 PROSED NT APPLICATE VHAH ZUUU 230 PROSED NT APPLICATE ZUUU ZBAA 231 SEAM, CM, 3K, DB, TM, ZBAA PANC 231 SEAM, CM, 3K, DB, TM, PANC JFK 233 TC, AM, 3K TFK PBI 234 TE, BT, SK, AND ROO PBT JFK 235 TE, AT, SK, LAND ROO JFK CMH 236 JE, 3K | ESSA ENGM 227 JE, AM, CM, OK, DOWS BAND, H SERVES OF THE CHANGE OF THE C | ESSA ENGM 22 DE, AM, CM, OK. ENGM UNNT 228 PR. AM, CM, OK. BAND H SERRES STRUCK UNNT VH HH 224 RES, AM, CM, OK. CAM, SERVER ERVICE VHH)H Z UUU 236 PRES, CM, CM, OK. CAM, SERVER ERVICE ZUUU ZBAA 231 EL, AM, CM, OK. CAM, UNSTANDER ZBAA PANC 231 EL, AM, OK. CM, OK. CM | ESSA ENGM 227 TE, AM, CM, 3K CNOM UNNT 228 TE, AM, CM, 3K, DOUGH BYNDH SERVEY 53 UNNT VH HH 224 PRESED NT APLL CLUSTON 1 65 VHH)H ZUUU 236 PRESED NT APLL CLUSTON 1 65 ZUUU ZBAA 231 SEAM, CM, 3K, DB, TRA MEDICATORIC 24 ZUUU ZBAA 231 SEAM, CM, 3K, DB, TRA MEDICATORIC 24 ZBAA PANC 231 SEAM, CM, 3K, DB, TRA MEDICATORIC 22 ZBAA PANC 231 SEAM, CM, 3K, DB, TRA MEDICATORIC 22 ZBAA PANC 231 SEAM, CM, 3K, DB, TRA MEDICATORIC 22 ZBAA PANC 231 SEAM, CM, 3K, DB, TRA MEDICATORIC 23 PANC JFK 233 TE, AM, 3K JFK PBI 234 SEA, BT, SK, AND REA, LC. 25 PBI TFK 235 SEA, BT, SK, LC. 1/26 JFK CMH 236 JE, SK, LC. 1/26 | ESSA ENGM 227 TE, AM, CM, 3K ENGM UNNT 228 TE, AM, CM, 3K, DOWN BAND H SERVE STREET STREET UNNT VH HH 224 PRESED NT APPLICATION / 65 VHH) ZUUU 230 PRESED NT APPLICATION / 65 ZUUU ZBAA 231 SEAM/CM, 3K, 0B, TRA SHORTOUR 24 ZBAA PANC 231 SEAM/CM, 3K, 0B, TRA SHORTOUR 22 ZBAA PANC 231 SEAM/CM, 3K, 0B, TRA SHORTOUR 22 ZBAA PANC 231 SEAM/CM, 3K, 0B, TRA SHORTOUR 22 ZBAA PANC 231 SEAM/CM, 3K, 0B, TRA SHORTOUR 22 ZBAA PANC 231 SEAM/CM, 3K, 0B, TRA SHORTOUR 23 PANC JFK 233 TE, AM, 3K TFK PBI 234 TE, AM, 3K PBT TFK 235 TE, AM, 3K, AND ROA, LC. 25 PBT TFK 235 TE, AT, 5K, AND ROA, LC. 26 JFK CMH 236 TE, 3K | ESSA CNGM 227 TE, AM, CM, SK. CNGM UNNT 228 TE, AM, CM, SK., DOWN BOND H SERRES STEEDING STATEM STA |

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| ~ <u>2</u> 4 | 13-727-314 | NOOSIK | CMH | TEST | | | TESK | | 37 | | | 4 | | |
| 22 | 40 | н | TIST | PBI | 4 3 | 38 | JA, SK, NEX CAMBRO, TEM PRYCHO | 11/ | 27 | | | | | |
| 23 | 13 | 11 | PBI | JFK | 2 | 39 | JE12K | | 24 | | | | | |
| 2.5 | 16 | 33 | JFK | PBI | 12 | 40 | JA BTENAMORSEN, COM, AM 332. | d | 25 | | | 24.58 | ENTIAL | DR_00006 |
| 04c | G-1159B | N90956 | MIV | IFK | 16 | ગલ | decay, worker on the things in an en | シンノ | 8 | | | 200 | | |
| \Box | \t | N | JFK | CMH | 11 | 574 | 26 2x word Demost Day | 1/1 | 15 | | | 100 | | |
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| 9 | 11 | 16 | PBE | TIST | 1 | 81 | TEISK, TO GARY REXPLECTS | 1/ | 24 | | - | | | |
| 15 | χŧ | 10 | TIST | TEB | 14 | ,82 | JE, AM, TD, KEMBERLY BURINS | | 45 | | | | | |
| 19 | 1e | 1.0 | TEB | TIST | | 83 | | 1/1 | 39 | | | | | |
| 24 | 16 | (t | TIST | PBI | 1 16 | 94 | JE, EM, BT STEVELENTER | 1/1 | 27 | | | | | |
| 26 | le · | 11 | PBI | TIST | 1 | 85 | IC, BTICIA GART HEAVEL! | 1/ | 23 | | +3 | | | |
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2004
39N2 | 16 | vi | TIST | POI | l h | 96 | MANUEL STOCTION DELIVER, NM | 1/1 | 27 | | | | | |
| 3 |) t | ١. | PAI | E5M | | 20 | 36, LELENA DIALU EN APPELLESON, LV
EM JERRAN AIRCH BRUCK, NADIO AMPRENTING
JG, LO, JO, GM, GA, MM BRUCK | 2 | 1 7 | | | | | |
| 3 | 11 | 16 | ISM | PBI | | 20 | 36, Co, 30, GM, EA, NM BRUCE LV | | | | | 14 | | |
| 3 5 8 | 11 | 10 | PBI | TEB | | | JE, BT, JLB, SK, LV | 11 | 25 | | - | | | |
| 8 | 11 | 11 | TEB | PBI | 16 | CIO: | 34, 87, 5LB, 5K LV | ., | 26 | | | 100 | | |
| | B-727-314 | N908JE | PBI | JFK | 2 | 41 | TEN BT, NM, TENCH DAVICES, SK LY | | 24 | | | | | |
| | 11 | 11 | JFK | PBI | L | 10 | E,5K,TO,NM | | 25 | - | | - > 3 | | |

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| | 13-727-314 | N908JG | PBI | JFK . | | 243 | JC, BT, NM, SK, TD | TO, LY | | 26 | | | |
| 23 | 11 | N | JFK | PBI | | 244 | TE, BT, NM, TD | TO, LY | | 26 | | | |
| | 6-115913 | N909JE | PBI | TEB | 1 | 1691 | JE, BT, NM, TD | LV | 1/ | 24 | | | |
| 28 | 11 | 11 | TEB | TIST | X | 1692 | JE, BJ, NM, SK, TO | LV | ., | 36 | | | CONFIDENTIAL DR_00007 |
| FEB | V.C | ** | TIST | TEB | 2 | | ALBT TLBINM, TO, SK | , LV | 1/ | 41 | | | W. |
| 28 82 5 5 | 1,0 | LX. | TEB | 840 | | 1694 | | LV | 1/ | 8 | | | |
| 5 | 10 | 14 | BED | TEB | | 16-66-5 | ALAN DERSHOWITZ | LV | | 1 (| | | |
| < | (1 | - 11 | TEB | PBI | | ILGI. | JE, AD, SK | LV | | 26 | | | |
| | B-727-314 | N908JE | PBI | JFK | | 245 | JEIRTISK, | S-K | 1/ | 25 | | | |
| 12 | 10 - | . 16 | JFK | LFPB | | | VICENTER, ALENE WERE | R, LV | -12 | 70 | | | |
| 17 | 11 | × | LEPB | BGR | | 24 | JEIGM, JLB, NN, TO, AW | \$2 LL | 77 | 69 | | 7-7 | |
| 17 | , (| 16 | BGR | JFK | | | JC,GM, JLB, TD, NM, AY | N LV | | 15 | | | 15 T |
| 19 | u | ,(| JFK | PBI | | | JE, BT, NM, SK, TD, | 77. | | 24 | | | |
| 22 | 16 | ,,, | PBI | JFZ | | | JE, BT, NM, TD, AW | 70 | 1/ | 30 | | 1 | |
| 2.4 | y t | 14 | JEK | MRY | | 251 | JE, SK, TD, NM, FOREST SAW | YER LY | 12 | 59 | | | |
| 27 | , i i | ıı | MRY | VNY | | | JEINMISK, TO | LX | VI | 8 | | | |
| | γv | VI. | VNY | ABO | - | _ | JEINM, SKITP | LY | _V_I_ | 16 | | | |
| 29 | 11 | 11 | ABQ | JFK | | 7-4 | JE, GM, NM, SK, TD | FX
FX | 11 | 34 | | | |
| 3 | 11 | u | JFK | PBI | - | 755 | JG, NM, TD, VALOSON COT | REN EX | 17 | 25 | | | |
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| 100 | | TOO MICHIGATE WATE | From | То | Flown | No. | Maneuvers, Endorsements | of Landings | ATR PLANS GLIDASA | Heir | uens |
| 37 | G-159B | NGOGJE | PBI | TEB | | 1697 | JENMITO BUHLOW | 11/ | 2 0 | 1. | |
| ਰ | 7.6 | | TEB | BGD | | 1698 | STE, TO GARY | 11/ | 20 | 1 | |
| 9 | , in | | BED | TEB | 4 | 1699 | JE, TO GORT | | | + | |
| .\ | | 1.0 | TEB | PBI | | | | 3 | 2 8
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11 | | |
| 3 | 10 | 11 | PBI | TIST | 11 | Des | JALDE SKIVEN STATES | 11/1 | 23 | - | CONFIDENTIAL DR_00007 |
| 17 | B-727-200 | SEMULATOR | | MED | 1 | 1 101 | LARBY - NYTRUCTOR CORY | | 20 | | |
| 7 | * , 14 | st - | MID | MEA | 6 | | HOLDONG- LARRY-ENGREUCIAL C | 2 | | 1 | |
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| 9 | 6-11590 | NGOGJE | TESS | PBI | | 1262 | JE, SK, TD, VC LY | | 26 | - | |
| 1 | 13-727-314 | N90826 | PBI | JFX | - | | JE, NM, TO, | | 23 | | |
| 1/2 | -71- | , (| JFX | PBC | | | JEIJLB, NM, TO | 1 1 | | | |
| | G-1159B | N909JE | PBI | TIST | | | JEIBT, NMISK, TD L | 111 | 25 | - | |
| | B-727-51 B | | PBE | JFK | | | JE BT CDEA JOGN NMTP L | | | - | |
| 5 | 10 | 1) | JFK | BED | 1 | 54 | TEISKILMARY SUMMERS LL | | 2,4 | - | |
| 6 | ١. | 11 | BGD | PBF | - | 12.11 | 76,5K | 1 | | | |
| 9 | N | 15 | PBI | ZEK | 1 | - | JE, SK, JENNIFER LY | 1/0 | 26 | | |
| - | u. | vi | JFY | PBI | 100 | . 1 | JE, BT, MARK EPSTEEN, NM LV | 1 | 26 | | |

| Date | Aircraft Make | Aircraft | Points of Depa | rture & Arrival | Miles | Flight | Romarks, Procedures, | | Number | Aircraft Ca | egory | | |
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| \$3.1A | 6-115913 | NAODIE | TEB | MOW | | 1712 | 34,5K | 1/ | 1/1 | 19 | | | |
| 13 | 11 | i, i | MOW | PBI | | 17ie | JEISK | LV | | 27 | | | |
| 13 | B-727-31H | NGORTE | PBI | JFX | 1 | 270 | JOISIL AD. GOSMAN | LM | | 25 | | | |
| | 11 | 11 | JFK | TIST | 100 | -03 | TE BIMS SKITD | Ł% | 1/1 | 35 | | | CONFIDENTIAL DR_000073 |
| 15 | 11 | vi | TEST | PBI | 7 | 274 | JE BTITEMER KAL | ETHONS, ES | 1/1 | 2-5 | | | |
| 21 | G-11591B | N909JE | | TEB | | 1719 | JE, BTI KALTER KALT
JE, BT, MS, NM | LV | | 26 | | | |
| 23 | 11 | VI | TEB | SAF | | 1720 | TE NM. SY | LV | Wi | 44 | | | |
| 23 | 13 | 16 | SAF | LAS | | 1721 | JEMS, NM, SK, SEM | cong, GR | 1/1 | 6 | | | |
| 2 | 1,0 | N. | LAS | SAF | | 1722 | JELMS, NM, SK, SEM | IRENKI GR | | 13 | | | |
| 4 | 14 | N | SAF | ASK | | 1-123 | 19 We WW > K 201 | MOJ. ME GR | 1/1 | 0 | | 1 | |
| 4 | ιč | r.l | ASE | PBI | | 1724 | JE,MS, NM, SK, SER | 105mc GR | 10 | 38 | | + | |
| \mathcal{H} | A.C. | V1 | PBI | TEB | l le | 1725 | TE AMPRES METROUR | LV | 1 | 2.7 | - | | |
| 15 | 16 | 11 | TEB | PBI | | 1726 | 表。如此是是
2.000 | JAKI LV | 1/ | 26 | | - | |
| | B-727-311 | N90856 | PBI | TIST | | 275 | 花瓜瓜KNM,JK,STG | FIRNES LY | | 26 | - | - | - |
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19 | 11 | 1.0 | TIST | PBI | | | | STEVE MALE | - | 26 | - | | 7 |
| 25 | 11 | 1.0 | PBI | JFK | | _ | JK,NM,BT | SM | 1/4 | 24 | - | - | |
| 24 | 1 _f | N. | JFK | LEPB | | 278 | JE,MS, NM, SK | 424 | 1 | 66 | | - | at a |
| | 77 | N. | LEPB | LEPA | | 279 | JE, MS, NY, SK, TD | 17 | 11/7 | 1 1 | - | +- | |
| 3 | 1.1 | u | LEPA | LPA2 | | 280 | Z.MS,NMISR, TD | 幺 | 11/2 | 36 | | + | 4 |
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| 3 | | N 10826 | LPAZ | TEST | | 281 | TE SE TO NO JENNESER HOUSER | 7 | 24 | - 7 |
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| 0 | 72 | 1, | PBI | IFX | | 283 | SK NATAUTH MINUTSIKU, PAUCO LA | 11 | 2.4 | SONEIDENTIAL DE COCCE |
| 13 | 11 | | JFK | ABQ | | 284 | 16 Wo'NWIR | 1/1 | + 74 - +- | CONFIDENTIAL DR_000074 |
| 18 | N.t. | 11 | ABQ | VNY | 1 | | THE STATE OF THE COMME COMME | V | 1 - 1 - 1 - 1 | |
| 9 | 15 | 10 | VNY | PBI | 1 | 2136 | LM | | 47 | - 4 1 |
| 24 | 16 | r.C | PBI | 366.U | | 287 | DE TOTAL POPULA | | 1 4 11 | - |
| 25 | 1. | 16 | SEGU | PBI | | 288 | | 11/1 | 4 3 | - M |
| EP | 14 | 31 | PBI | TIST | | 289 | JE, NM, SK, TD LY | | 32 | |
| 2 | G-1159B | N909JE | PBI | TEB | | 172 | | | 25 | - |
| 5 | B-727-314 | N909JE | TIST | JFK | | 240 | JANA MILYSHOV ROLPH PASIN | 41/ | 3 8 | - 4 |
| 6 | 1 4 | 11 | JFK | PBI | | 291 | IZE! MW 'SK'IK' DINNED WOLKEN FW | | 127 | |
| 10 | BHT-407 | 25535 | BELLSCHEEL OF LI | HURST, TX | | | HOWER, HOVER A VIOUS, OBTACLE JAKE-DEF
STROKEN - EN AVIOS, 180 AUTO | | 1-17- | |
| L | B144-401 | 53755
53755 | Billigena. | 11-URSS, TX | | 1 5 | 9119-1-1733849 CFI EXPIGOO | | 10 | 1 6 |
| 1 | 13-727-311 | NAGGIE | BBI | ZEK | | 240 | JEINWISKI EN | 1/1 | 124 | _ |
| | 15 | 18 | TEK | PAI | | 247 | TE END ANDERSON, NM 2 NEWS EN | | 23 | |
| Ö | 13 | 13 | PBI | TEK | | 299 | LEGUA AMERICANA MANA DODEN LM | 1/ | 25 | * |
| 2 | 11 | 55 | JEK | TIST | | 299 | JE, JK, NM, SK | | 33 | |
| 13 | G-1159B | NAPORTE | TEB | PBE | | 1124 | LV | | 25 | |

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18 | Check | NO09 56 | From | PBI | - | m de | TE TY, NM, SK, DE | ۸, ۱۷ | | 23 | PEC. | |
| | G-1154B
B-727-31H | N909JE | TEB | AL POT | 4 | 1740 | AMORGO | 1.7 | 16 | 26 | - | |
| 2.0 | 1) | NIDUJE | | PBI | 1 | 3.5 | / | بترا | 1 | 10 | | |
| <u>20</u>
23 | 10 | 1.1 | TAX | TEST | K | 3.17 | JENNISK BY | 77
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77 | _1/ | 23 | | CONFIDENTIAL DR_000076 |
| 26 | 6-11598 | NAOGJE | PBI | TEST | | | GM JK | LV | 1/1 | 24 | | |
| | | N90856 | | JFK V | | 30 | JE, GM, JK, NM | SK, DM, SH LU | 1/ | 40 | | |
| 28
1850 | 111 | 11 | JFK | PRI | | | JOREMUNK, SH. | EM | 1,7 | 2.8 | | |
| 14 | B-727-200 | SEMOLATOR | | MICH | | | HANK COUCK-LN | | | 10 | | |
| 15 | 1. | 33 |) (| 11 | | | HANK CULLUSE - EMSTRUC | 3050 | | 1 17 | | |
| 15 | 10 | 1.1 | Fig. |) (| | | REY BALLANA INSTR | vitore withers | | i ja | | |
| 21 | 6-115913 | N909JE | PBI | TEST | | 1740 | JEISKINM, GM | STEVE LOS TOYE | 1/1 | 2,3 | | |
| 29 | 1.1 | 11 | TIST | TNCM | | 1746 | JG, NM, SK | LV | | 7 | | 4 |
| 29 | 1,0 | W | TNCM | TIST | | 1747 | JE, NM, SK | LV | | 7 | L | |
| 30 | BHT-407 | N4916M | | | | | | LV | | | | |
| 30 | 6-1199B | 11 | L55 | アレンナ | | | TT - 2 () OM | LV | , | | _ | 1 3 3 3 |
| 3001 | | N969JE | T15T | TAPF | 1 | 174 | TELTLE SILLEN | INTA BROUKELV | 1/1 | 6 | | |
| 1 | 1, | 11 | TAPE | PBI | | | JE, DM, ILB, MM, SI | | 1/1 | 32 | _ | |
| 3 | · 11 | 11 | CBF | TER | | 1750 | JE, DM, GM, NM, S | | | 27 | 1 | |
| b | 11 | W | TEB | POI | | 17:51 | JE, DANA | LV | | 27 | | |
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| 2005 | and Model | identification Mark | From | То | Flow | | Maneuvers, Endorsements | | of Landings | ALERAN GLIDA | THEALT | |
| 306 | G-115/1B | N4093E | PBI | JEB | | 1787 | JE, AM, SK | LV | | 25 | | |
| 10 | 14 | - 11 | TIST | TEB | | 10-1 | JE, AM, DB, NA | | 1/1 | 40 | 1 1 1 1 1 1 | |
| 18 | Ŋ | 35 | PBI | TEB | 1 | 1792 | JE DB SK | LV | W | 26 | | |
| 20 | 11 | 2) | TEB | BKL | 1 | 1793 | | DOMO | VI | 12 | 1 | ONFIDENTIAL DR_00007 |
| 20 | 36 | 11 | BKL | TEB | -2 | 1774 | | D'W COMO | | 1 2 | | |
| 22 | 11 | 77 | TEB | PBL | 4 | 1795 | | ANNA BH | | 25 | | |
| 25 | 10 | 11 | PBI / | TEB | | - | JE, SK, DB, TOTIANO | | | 26 | | |
| 25
28 | 33 | 77 | TEB | TIST | | 179 | JE.NM.JK | RH | 1/ | 39 | 999 | |
| -1-1 | 16 | 11 | TIST | TEB | | 1796 | TE.JK.NM | BH | 1/1 | . 38 | | |
| 2 | N. | 77 | TEB | SAF | | 179 | JE, NM, JK
JE, JK, NM
JE, SK, OB, AM, JE
JE, SK, OB, AM, JE
JE, SK, OB, AM, JE | N, NATOLES BH | 1/1 | 36 | | |
| 18 | 11 | 33 | TEB | PBI | | 1802 | TE AND METINES MU | ENSKA, LV | 1/1 | 23 | | |
| 22 | 11 | 35 | PBI | TEB | | ies | JE, NM | LV | | 2.5 | | |
| 24 |)(| 11 | TEB | FOK | | 1807 | JE, DB | LV | 1/1 | 8 | | |
| 24 | , ta | 31 | FDK | TEB | | 1858 | JE, DB | LV | 1/1 | | | |
| 26 | H | ν., | TEB | MVY | | 1409 | JE, DB. SK, DM | LV | | 8 | | |
| 26 | 10 | 11 | MVY | TIST | | 1810 | JE, DB, SK, DM
JE, DB, DM, SK | LV | | 33 | | 5 |
| | •1 | 1) . | TIST | PBI | | 1811 | , -, -, -, -, -, -, -, -, -, -, -, -, -, | LV | 1/1 | 26 | | |
| 27 | M | 1.1 | PBI | TEB | | | JG, DB, GM, AM HAL LEXO-ENTRECTOR | | | 24 | 53 | |
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Number

Aircraft Category...

AZERLANG GLODGE HEUN

Aircraft

Identification Mark

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18_

B-727-200

Points of Departure & Arrival

From

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Remarks, Procedures, Maneuvers, Endorsements



| Date | Aircraft Make
and Model | Aircraft
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| 12 | G-1159B | N96936 | TEB | TIST | | 107 | TOWN MARK MARK THEOMOBY | | 34 | |
| 16 | ht . | 11 | TIST | TEB | _ 4 | 163 | AM MOUNT JUM LV | 1 | 38 | |
| 17 | - 11 |)ı | TEB | Bep . | 6 | 194 | JE, MAN LV | Vi | 8 | in in |
| 17 | и. | - 31 | BED | CYULS | X | | ALAN DERSHOWETZ LV | 1/1 | O | CONFIDENTIAL DR_000081 |
| 17 | 11 | N | CYUL | BCD | -2 | 184 | 2 ALAN DORSHOWED. LV | | 8 | ,è |
| 17 | H | 3.1 | BED | TCB | | 164 | JE, AM, AD, TAILANNO LV | | y | |
| 19 | B-727-31# | NACOTE | JFK | TIST | | 353 | JEINMISK EM | | 35 | |
| 20 | 11 | 7) | TEST | TAPA | | 354 | The second secon | 1/1 | g | |
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| 28 | М | - 11 | TIST | ゴドK | | 3% | JEAM, 52, MARK MEOUR BY | | 39 | |
| 30 | G-1159B | NACAZE | TEB | BED | | 1844 | DEIBWINN BY | | હ | |
| 30 | }(| 11 | Ben | TEB | | 1816 | JC, AM, NM BH | | q | |
| Dec | 11 | SIMULATOR | DEW | DFW | | | MOLDENG, STEED TURNS, STOUS, SETURET, NO FLORE LANDENS, NUTEROCKE STOUNKE | | 25 | |
| 11 | ıı | 13 | 14 | 11 | | | RYO, GHERGEYLY DOCKENT, VI CUT, | 2/2 | 20 | |
| 21 | | NAATLE | TEB | BED | | 1823 | GM LV | 7-1- | a | |
| 21 | 17 | 13 | BED | TIST | | | GM, LARRY + LIGH SUMMORS LV | | 38 | |
| N 15 | W | N.C. | TIST | Ben | | 1654 | | 1/ | 38 | |
| 16 | 1.1 | 1) | Bed | TEB | | | JE, NM LV | ,,_ | 10 | |
| 19 | 11 |)] | TEB | SAF | | 185 | TE, GMITZ, NMISK LV | | 45 | |
| I certify If | hat the statements mad | te by me on this form ar | | | | | Page Total | 7/6 | 398 | |
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| 253 | G-1159B | Nachte | SAF | | | 100 | JEIZINM JOHNA | 9/9 | 34 | | |
| 26 | 11 | 15 | TEB | BED | 1 | 1849 | JE, ADRIANO/JOCKS | | 38 | | |
| 31 | 11 | 11 | TIST | TEB | | 1860 | JE, AM, NM | | 110- | | |
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FeB | 11 | N | | Bos | 1 | 1863 | CHA KANG | - | 40 | | <u> </u> |
| 15 | | 1) | 755T_ | PBI | | 1880 | BLAN DERSHOWSTZ, GARYGONG | 41/1 | 30 | | |
| 15 | 16 |)(| PBI | TOB | 1 | - | ALAN DERSHOWIST GARY FEMEL | 91/1 | 29 | ++-1 | - |
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| 21. | 16 | 11 | TEB | BED | | 186 | TE INM | | | + | _ |
| 22 | 11 |)(| BGD | TEB | | 100 | JE, NM B | | GONFIDEN | TIAL DR | 0008 |
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| 26 | | 11/ | TIST | TEB | | 187 | HE, TZ, NM, SKILL | | / 42 | + | - |
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| 13 | 10 | 10 | TEB | BED | | 160 | 1751111111 | | 10 | | |
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| 16 | | H. | TEB | TIST | | 187 | 76 72,56,50 | 1 W | 20 | | |
| 23 | B-727-200 | SEMULATOR | MIA | MEA | 1 | _ | HARL LGTO- SIMILUSTRICTOR HOLDEN WILLEAM LEWINGER ENSIRED | <u> </u> | 25 | | |
| 23 | i. | "IL " | 1(| - 11 | | | B-727 CHECK REAS
RAY BARZANA - PC | - | 20 | | |
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RAY DA EZANA, WELLAM, WAL | :5/5 | | | |
| i certi | iy that the statements m | nade by me on this form | are true. | | | | Amount Forward | 6837 | 9889 8 3 | 3 129 4 | 2_ |
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APR | G-1)59B | NGOQJE | TEST | TEB | 1 | 1821 | XE, DB, LC, TS, | LV | 1/1 | 40 | | | | 1 |
| 920 | 11 | 11 | TEB | TEST | T | 1550 | JE, IZ, LC, NM, SK | 1.0 | | 36 | | | | |
| 17 | 13-727-311H | MARTE | TIST | JEK | Г | 26 | 36,00,6M, 52, 66) | | - 25 | 39 | | | | - |
| 25 | 11 | 11 | JFK | BEP | | 345 | JE/12, LL, NM, SK | SH | 1/1 | 9 | | | | - |
| | 11 | 11 | BED | TEST | - | 368 | | 熨汰 | 1/ | 34 | | | | - |
| 25
MA4 | BHT-467 | N407BP | AFW | ASW | 1 | WITH | B OF PLOT CERTIFICATE # | | t. | | | 7 4 | | 1 |
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| 20 | B-727-31H | | JEK / | LEPR | | 372 | JE OB, GNINM, SK | FW. | 0/1 | 69 | | | | 1- |
| 26 | 10 | 11 | LEPB | BGR | | 377 | 56,03,5K | ŁX | , s = | 74 | CONE | IDENTIAL | DD-00 | nno |
| 26 | 10 | 11 | BGR | ZEK | | 374 | JE, OB, SK | LM | | 13 | CONT | DENTINE | DK_00 | 000 |
| 26 253 | 13 | 12 | JEK | TIST | | 275 | 16,08,12,LC | SA | 1/1 | 3 5 | | | | 11- |
| JUN | 14 | 14 | TIST | JFK | | 376 | JE, IZ, LC, SK, JUAN / | STEEDNEST MEM | | 38 | | | | 1- |
| 11 7 | н | 11 | JFK | TIST | | 37 | EXTEND KORSHENON | LM LM | 1/ | 37 | | | | 4 |
| 24 | 16 | 11 | ABQ | JFK | | 300 | 36,12, LC, SK, ST | - LM | | 39 | | | | + |
| 24 8 | Le | 1Ü | TIST | JFK | | 382 | JE, LC, NM, IZ | F.W | | 38 | | | 1 | ++ |
| 8 | VC. | 11 | JFK | TIST | | 363 | JENM, SK, ST | G.H | | 37 | | | 1 | + |
| 12 | | N | TIST | JFK | 1 | 384 | JE, NM, SK, ST | BH | | 37 | | | 1 | ++ |
| 14 | | 11 | JFK | EGGW | | 335 | JE, GM, DB, SK | B 以 | 1/1 | 65 | | | 1 | ++ |
| | y that the statements ma | ade by me on this form | are true. | | | 5 | 0 | Page Total | 6/5 | 640 | | 33 | M. II. — | +1 |
| 1 | \bigcirc | | | | | (9 | e e | Amount Forward | 6442 | 9940 0 | 33 | 129 4 | 2)76 | 8 |
| Dilate | Signature () an | rd lodge | 12 | į. | | ş | | Total to Date | 6489 | 10,0040 | 33 | 132 7 | 317 | P 8 |
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| 2006 | | Identification Mark | From | Te | Flown | No. | Maneuvers, Endorsements | of Landings | | on Heutcopie | SEL | |
| 2006 | B-727-31H | N908JE | EGGW | LFPB | | 39 | JG,GMISK BH | 8 | 10 | Medicaria | 25- | 1 |
| 20 | | 17 | LEPB | JFK | | 36 | TE CV RH | 1/1 | 1 1 1 | ++ | | |
| 22 | LC . | 10 | JFK | PBI | | 300 | | | 30 | | | + |
| 23 | G-1159B | N909IE | PBI | TIST | | Mary Mary | JE, SK, JK, JOULED STARODOUMONEV | | 26 | | | T |
| 23 | | 11 | TIST | EWR | | | | 0/ | 12 (| | | 1 |
| 16 | 11 | 15 | TEB | EGGW | | 1896 | | 1/1 | 65 | | | 1 |
| 17 | u. | - n | EGGW | LETB | | | GM 3W | 1/1 | 25 | | | 1 |
| 19 | 1(| 11 | LEIB | EGGW | | 1898 | | 121 | 23 | | | 1 |
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| 28 | 14 | 11 | LETH | LFBE | | 1400 | | 11/ | | NFIDENTIAL | DP 000 | 00 |
| 28 | 16 | 11 | LFEX | EGGW | | - | GM, KEVENMAKWELL LADY ROBEN INNES KER | 1/1 | 1 5 | MIDENTIAL | DIX_000 | |
| 450 | 11 | 24 | EGGW | EGPH | | 1902 | CM, PRINCE ANDREW - DUKE OF YORK, JW
KATER BEACUS, CRASNASKY | 1/1 | 10 | | | |
| 5 | · V | M | EGPH | CYQX | | 1903 | | 1/1 | 45 | | | |
| 2 | 14 | 11 | CYax | TEB | | 1904 | | Vi | 28 | | | П |
| 22 | B-727-31# | N908JE | EWR | MIA | | | IE DANA BURNS, IGOR ZENOVEKY BH. | 1/1 | 25 | | | |
| 22 | 15 | 15 | MIA | TIST | | 399 | JE DONA BURN CLOR ZENOVIEV BH | 17 | 25 | | | \vdash |
| 23 | - 11 | 11 | TIST | VQQ | | 400 | EH EH | 1/ | 29 | | | |
| 24 | G-1159B | N909JE | TEB | TIST | | | CM JEHUTESE KALDU LANGE CHUNG LV | | 36 | | | 1 |
| 2 | 16 | 11 | TIST | BED | | 1906 | JE, NAPTA MERCEN KAVA, LV | 1/1 | 3 9 | | | T |
| I certify | that the statements mad | ie by me on this form a | re true. | 5 | | | | 2/11 | 57 3 | | | T |
| | | 01 | | | | | Amount Forward | SAUA | | 3 132 7 | 2176 | Q |
| Pilot's S. | gnature Dan | ich Rode | fis | * | Ŷ. | | Total to Date | 260/ | | 128 | A-H-2 | 12 |
| | B 21 € | |) | | | | | 6461 | 10,0613 3 | 3 132 7 | 3176 | 15 |

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| 007 | G-1159B | N909JE | BED | TEB | 1 | 907 | JC, NAOIA MARCENKOVA,
BONA RURS, ANDREA W
JC, LANGE CALLOWAY, NAOIA N
NA SALYA MALY SHOV, VE | SAKAH KULUYLV
ILLIS | | | 1 | | | T | |
| 6 | 31 | 11 | TEB | TIST | 1 | 908 | JE, LANGE CALLOWAY, NOOZA N
NA SALYA MALY SPOV, UE | in escating and LV | | 40 | | | | | . L |
| 26 | | - 11 | T15T | TEB | 4.1 | 413 | BUKBUKH WORKONH TONG | E CHLLOURY, BIP | 1/1 | 4/2 | | | | 11 | L |
| 27 | 11 | 15 | TEB | TIST | | 944 | JEINADIA MARCENKOV | B BH | | 31 | | | | 11 | - |
| NOV | . 41 | SIMULAT OR | DEW | DFW | 1 | | FRANK MCAFEG-CREW | steep turing som | s, coaucie | 40 | | | | 11 | į |
| 9 | 1.0 | N . | DFW | DEW | b | 6900 | FRANK MCACE CERSON WIN | NO FLAD LAMOD | W. CM. OUS | 40 | | | | | |
| 13 | B-727-314 | N908JE | ABG | TIST | 1 | 405 | JE, JENNIGER KALEN,
NAMED MARCEUROVA | FW | 1 | 40 | | | | | |
| 20 | 16 * | 33 | TIST | EWR | ٤ | 106 | TE SENTER KALEN, TEOR ZI | LER NMLM | | 3 | | | - | | - |
| 21 | . 56 | ١, | EWR | ABQ | L | 107 | JONESSA RPEUCR IZ | KUCKA, LV | | 43 | | | - | | |
| 25 | 11 | 16 | ABQ | TIST | | 108 | 34,22, NM, SK | LV | | 51 | | | | | 1 |
| 27 | BHT-407 | N491GM | PBI | FXE | | | to can add fol main | | | CO | NFIDEN | TIAL | R_000 0 8 | 5 | |
| 27 | NE . | 11 | FXE | PBI | | | FROM CAU ADE FOR MA | | | | | S | | - | |
| DEC | B 727-200 | SEMULIER: | MIA | MIA | × | | BILARD CREWY CUST ASS | LILOGO CHALLGE | Mala tolls | 20 | | | | | |
| 1 | No. (c) |) is (| MIA | MIA | | | KEY BUKE TOWN E DE MOCIONE | | | 20 | | | - | - | |
| 10 | G-1159B | N9095E | EWR | TIST | V | 94 | JE JUNIER KALTYSAR
NAVALIA MALTSHEV | LAH RANSOMEV | 1/ | 3 11 | | | | - | |
| 14 | 1) | 11 | TIST | EWR | ١ | 920 | IE NAODO MARCON LOV | b LV | | 39 | | | | - | 1 |
| 2.1 | II. | . 13 | EWR | PBI | | 921 | GGRALD LEFCOURT | JIM, | 1/1 | 25 | | 100 | | _ | |
| 21 | · vi | AN. | PBI | ISP | 1 | 922 | GERALD LEFCOURT | WEREN ! | 1/ | 2.5 | | 3 | | - | - |
| 2007 | B-727-311. | N908JE | TIST | EWR | L | 116 | JEIGH, IZINMINATHEN VALDEUD COTRED JOHN A | MALKING H | VI | 3 0 | | | 10 | - | 1 |
| I certify | that the statements ma | de by me on this form a | are true. | B w | | | PEBLAYA CHAMO | ge Total | 5/4 | 59 | | 10 | - | - | 1 |
| | | 10 | 1 | 2 9 | | | Arr | nount Forward | | 10,061 3 | 33 | 132 7 | 2 1 | 76 8 | _ |
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| 2 JA | B-727-31H | N908JE | EWR | TIST | × | 417 | JE IZ WALTER CRONK | RIELLO BH | | 33 | | | | - |
| 16 | ¥1 | νl | TIST | BED | | 418 | JE IZ WALTER CRONK
NM, SK LC, JOHN AME
JE, 12 LC, NM, SK
MARTEN NOWAY, PRALESP
JE, NM, SK | COOMO LM | | 3 | - | <u> </u> | 1 | |
| 16 | 16 | 11 | BED | EWR | | 419 | JENM, SK | 12V | | 1 2 | - | | | |
| 20 | 10 | N. | EWR | LFPB | K | 420 | SE,GM,LC,NM,SK | SEMAKKI LM | 1 | 6 | 1 | | | |
| 21 | 11 | Yt. | LFPB | EDDM . | | 424 | JE, SK, NM | PRS LYM | | 10 | 4 | | 1 | i |
| 22 | 10 | 10 | EDDM | LEPB | 0 | 1122 | JE,SK,NM | IRS LM | | | 2 | 1 | | M |
| 27 | M | М | LFPB | EWR | | 423 | JG, SK, NM, LC, JLB | IRSLY | | | 5 | | | |
| 31 | νt | 11 | EWR | TIST | | 424 | IL ANDREW FORGUS, IZ | GEORGE CEN | a | 3 | 3 | | | · |
| FEB | BHT-407 | N491GM | TEST | LSJ | | | | - EX | 225 | | | | 1 | |
| 11 | 16 | 11 | LSJ | TIST | | | | LV | | | | Ц | 1 | |
| 12 | B-727-311 | N908JE | TIST | BED | | 42 | TAM SERVE DERBY, J | K KH | 8 | 309 | NEID | ENTIA | L DR | 000086 |
| 12 | · ii | W 4 | BED | EWR | | 426 | | THE THE | | | 0 | | | |
| 20 | 11 | W/ | TIST | EWR | | 429 | | EX. | | 4 | 0 | 1 | | <u> </u> |
| 20 | G-1159B | NEODIE | ISP | EWR | | 1423 | | BIH | | | 7 | 1 | | |
| 22 | 11 | (11 % | EWR | TIST | 1 | 1924 | X. | LV | | 3 | 5 | | | |
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| 27 | u, | W | EWR | ISP | | 192 | | BH | | | 6 | | | |
| MAR | B-727-200 | SA MULATOR | MIA | MJA | | 1 | RICK MONURY - ENSTRUCTOR | RTO, VICUT | | 2 | 0 | | | |
| 2 | Ų. | L) | MIB | MIA | | | RET BORZAVA-IN MRUCTOR I
WILLIAM LEUMARDO-CREW | LEO GORACUNO
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| | that the statements me | ade by me on this form | | | | | CATTALCOALL | ge Total | 1/2 | 50 | 3 | | 2 | |
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| entrant a | - 4 | weller | Jelin | | | | То | tal to Date | 6866 | 10,00 | 7 3 | | | ・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・ |
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| 2007
MAR | 0 000 000 | 15000-2 | EWR | TIST | 1 | 433 | ELINTWIND | es 1/ | 35 | | | | 35 | |
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| 20 | | 10 | PHL | EWR | | 435 | EX | | (| 3 | 1 | | 6 | |
| 20 | C 1150 D | | | TIST | | 133 | 11/ | 11/ | 35 | 5 | | | 35 | |
| 23 | G-1159B | N909JE | 15P | TEST | | 136 | N. D. | 1/ | 36 | | | | 38 | |
| - | B-727-31H | NGOBJE | EWR | EWR | | 137 | | , | 4 | 1 | | | 41 | |
| 18 | 11 | | +FST | EWR | | 932 | | 11/1 | u'a | | | | 40 | |
| 1 | 6-11598 | N909JE | FUST | CYXU | | | TO PAINT SHOP (COSTOMS) L' | | 1 | S | | | 15 | |
| 15 | 11 | | | | | | TO PAINT SHOP L' | | | _ | | | 3 | |
| 15 | - 10 | 11 | CYXU | CYCE | | 443 | TO FIDE TO THE TAXABLE PROPERTY. | | ' | | CONFID | ENTIAL- D | D 0009 | 77 |
| 17 | B-727-31H | | EWR | BED | | | 77 | 1.1/ | 3 | | - 60111112 | LINLIAL | -39 | ,, |
| 18 | 1(| 11 | BED | 7157 | - | 444 | USE OF CHECKLEST, IIPS | | | 1 | 15 | | | |
| 31 | 5-764 | STAULATOR | PBI | PB5 | | * | EUCZNE HUT STARTS, POWER | | | | 15 | | 1 | . 2 |
| MOR | 34 | м | PBI | PBI | - | - | ENGINE CALLURES AUTOROTATED | ν, | - | | 15 | | | 8 |
| 2 | 15 | - 10 | PBI | PBI | - | | ENGINE CAILURES AUTOROTATION DITCHENC. PENAL TURKS. CMEINE FAILURES 30 SCOMP PENAL, I MAD FONDER, I MAD FONDER, I MAD STEEP TURKS AUTORITED, FORCE TRANSTER, ELIGIBLE DERECTOR. | UIG | | | 15 | | | 5 |
| 3 | 10 | 11 | PBI | PBI | - | | STEEP TURBS AUTO PELOT, FOR & TREM | 2 | 220 | | 40 | | | 3 |
| 5 | , le | N., | PBI | PBI | | | BITEL TRIM FITCHT OFFICER ENGINE FIRE ENGINE & BUTPOUN, CONEX STIKLE ENGINE LANDING, RID, MISSELLE STIKLE ENGINE LANDING, RID, MISSELLE ENGINE | SO PARAS | | | 40 | | | 7 |
| 6 | ii | , N | PBI | PBT | | | FMS OPERATIONS, HOLDENS, UNUS | IAL ATTE | Tues | | 40 | | | 1 |
| 7 | C.C. | 10 | PBI | PBI | - | | STALLE ENGINE LIMBERS, NO PRESENT
FAS OPERICATION, HOLDENING, UNION
STALLE ENGINE ILS APPROPRIED
BLOW LAMPERE CORP. WHY STALLES.
BUSING CAPELING, DECUMATOR | CIENS FOR | LIGG. | | 31 | | | 9 |
| 8 | . * | 1 | PB2 | PBI | | _ | DUAL SERVO FASLURG, DECUMATOR | MGBAOT | 4 29 | q | 217 | | 299 | 35 |
| Loentify | that the statements m | ade by me on this form | are true. | 9 | | | Amount Forward | 6966 | | 7 3 | 77.288 | 2 176 | 8 79939 | |
| | | 1.0.1 | 0 | | | | 8 9 | 646 | | | 1 | Company of the Compan | 8 8023 8 | 1492 |
| Pilot's | Signature DQ | ixel Little | ne_ | | | | Total to Date | 64- | 10 200 | 0 2 | 112-16 | 2176 | 0,000 | 1 |
| | | | | | | | | | | | | 100 May 200 | | |

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| 5-6-03 | BHT-LATSTO | FTD | BELLIX | BELL, TX | | | FADEL TRAINING | | | | | 10 | | |
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203 | 14 | 15 | BGU, TX | BGLL, TX | | 1 | FAREL TRASNENG | | | | | 10 | 1 | |
| 201UN | SK-76C+ | SEMULATE | PBE | PBI | 1 | 1000 | STURE PEDAG, FEXED PETEN, CABLE FA. DETINE ANTO ROTATIONS, CONFERING THA ESTIMAN WEST POWER, BUYL SERVO FARMA BRAKE FALLNICG, NO TOTE RATHER AND ROTA | CLULE
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| 10 | 33 | . N | PBI | PBI | 1 | | BRAKE FALLLICK, NO TOTE RETUR AND ROTH | EAUS | EZCH, | | 1 | 1 0 | | |
| 19 | B-727-31H | N90956 | EWR | TIST | | 450 | Ew Ew | | 3 | 7 | | | | |
| 22 | 1.0 | 11 | TIST | CMH | 1 | 451 | Lw | 1/ | 4 | 0 | | Siling | | |
| 23 | 1.6 | 16 | CMH | EWR | | 452 | LV
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| 2.5 | . 12 | v | EWR | MEA | | 463 | ا ليك | 1/1 | 2 | 6 | 1 Jan 6 | | | W. |
| 301 | 15 | k . | TIST | EWR | | 457 | ۲.۷
د س | Vi | 3 | 8 | | | | |
| 19 | G-1159B | N909JE | CYCE | CYXU | | 1435 | EMERICALL CLASSICAL COR | | | 4 | | | | |
| 20 | 10 | 1.6 | CYXU | PTK | | 1936 | LV | 1/1 | ah | | NITIAL | | 200000 | |
| 21 | B-727-314 | N9083E | EWR | EWR | | 460 | LV
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| 22 | 3(| 11 | EWR | TIST | | 461 | 'E'W | | 3 | ક | 9 | | | |
| 22 | 11 | 6 | TIST | MEA | | 462 | 50 | | 2 | 7 | | | | |
| 23 | 13-727-200 | SIMULOTOR | MIA | MEA | | | JOG GLEGEN FE REGULARINE | | 2 | 5 | | | | |
| 24 | 16 | B | MID | MEG | | | REST BARROWS - PC FG
HALLETO JOE GLESSON | | 1 | 0 | | 100 | | |
| 30 | G-1159B | N90956 | TIST | TEB | | 1940 | BH | 1/1. | 3 | 3 | | | | |
| 31 | L) | 11 | TEB | MIA | | 1941 | BH | - | 2 | 7 | | | | |
| 31 | 13-727-314 | N90856 | MEA | EWR. | | 463 | GH
CW | | 2 | 7 | | | | |
| l certif | y that the statements man | de by me on this form a | are true, | | | | Page Total | 6/5 | 31 | 6 | 1 | 00 | | |
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| . 0 | 007 | BHT-407 | N4916M | TEST | TEST | | | | | | | | 3 | + | 3 | 7 |
| 1 | | 13-727-31 H | N908JE | TIST | EWR | 1 | 465 | LV. | | 37 | | | | | | 5 |
| | | | N90956 | MIA. | PBI | | 1902 | , LV | | 5 | | | | 1 | 5 | 4 |
| | | B-727-31H | | EWR | VNY | 1 | 466 | संस् | | 54 | | | | | 1- | 1 |
| | 16 | V | 14 | YNY | ABQ | 1 | 467 | 1819 | | 17 | | | | J | 3 | 1 |
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| | 21 | T _i | 11 | MIA | TIST | | 469 | 8 H
8 H | | 25 | | 1 | | | 3 | |
| | 27 | 16 | 1. | TIST | EWR | | 470 | BB | | 37 | | | | | 2 | |
| | 27
29 | 6-115913 | NAGAZE | PBI | TEB | | 1943 | . LV | VI | 2 5 | | | | | 1 | 5 |
| di pi | 30 | 11 | 11 | TEB A | HPN | | 1944 | . LV | | 5 | | | | # | | - |
| | 30 | NI. | 11 | HPN | TIST | | 1445 | LV | | 37 | CON | FIDEN | TIAL | DR_0 | 00089 | 4 |
| | SEP. | 13-727-311 | N90876 | EWK | PBI | | 47) | . LV | | 24 | | <u> </u> | | | 3 | 6 |
| | 18 | 6-11598 | N90916 | TIST | TEB | | 1455 | LV | | 36 | | | | | 3 | |
| | 30 | B-727-31H | | TIST | EWR | _ | 474 | F) | | 36 | | | | | 2 | |
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| | 18 | G-1159B | NAGAZE | TEB | BED | | 1956 | 91 | 1/1 | 10 | | | | <u> </u> | + | 10 |
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| Date | Aircraft Make | Aircraft | Points of Depar | ture & Arrival | Miles | Flight | Remarks, Procedures, | - Incorporate Inco | Number | Aircraft Category | | _and Clas | ., | HELICOPP |
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| 2007 | and Model | Identification Mark | From | To | Flown | No. | Maneuvers, Endorsements | | of Landings | ATRPIANE GUEDGA | HELICIPIUR | SEL | MEL | LAMEN |
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18 | G-1159B | N909JE | BED | TIST | 7.7 | 1957 | | BH | | 35 | | - | 35 | |
| 25 | 11 | 11 | EMPREM | TESTES | | 1959 | . 15.5 | LV | | 36 | | - | 36 | , |
| 26 | B-727-31H | N968JE | EWR | VQQ | | 479 | 211 | 6)) | | 23 | | | 23 | 5 |
| 262 | G-1159B | N909JE | TIST. | TEB | | 1962 | | LV | 1/1 | 46 | | | 40 | , |
| 8 | 1/ | 11 | T68 | TIST | | 1963 | | LV. | | 38 | | | 3 8 | S |
| 15 | 1/ | 11 | TEB | TIST | 1 | 1967 | | вн | | 36 | 124 | | 36 | |
| 17 | и | 11 | TIST | BED | X | 968 | | BH | M | 39 | | | 39 | |
| 17 | 11 | -, 11 | BED | TEB | 1 | 1969 | G | BH | Vi | 9 | | | 1 | 9 |
| 21 | - 11 | h | TEB | TIST | | 1970 | | 1314 | | 35 | | | 35 | 5 |
| 26 | - 11 | W. | TIST . | TEB | | 197 | 9/ | LV | | 41 | ONFIDENT | AL DR | 000000 | |
| bec | 13 | SIMULOTOR | prw | prw | | | ARENT KIDBY, CREW
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| 11 | M | N909JE | TIST | TEB | | 1976 | | LV | | 40 | | | 40 | > |
| 13 | 11 | 11 | TEB | PWM | | 1977 | K. | LV | 1/1 | 1 0 | | | 1 (| O |
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| 14 | | 1) | TEB | MIA | | 1980 | | LV | | 29 | | | 28 | 8 |
| 18 | 311 | 11 | TIST | PBI | | 1482 | | LV | 1/1 | 28 | | | 2 | 8 |
| 18 | Vt | 31 | PBI | TEB | | 1483 | | LV | | 24 | | | 2 | 4 |
| certify t | hat the statements man | de by me on this form a | re true. | | | | | Page Total | 5/5 | 55 [| | | 55 | 1 |
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of Landings | AIRPLANS GLIDER HOLLOTER | SCL | ME |
| 21 | G-1159B | N96936 | TEB | TIST | | 1984 | LV | | 35 | | 7 |
| 3906 | 26 | . 11 | TIST | TEB | | 198 | | 1/1 | 39 | | 1 3 |
| 11 | 10 | 11 | TEB | TIST | 1 | 1984 | LV | | 35 | | - |
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| 16 | 11 | 11 | , W | 11 | 7 | | REY BARZANA - FE DC
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| 18 | N. | Jt. | ж | | | | REY BARZAND. CAPT PC
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| 26 | G-1159B | N969IE | EWR | TEB | | 1991 | LV | | 5 | | - |
| FEB | L) | 11 | TIST | TEB | | 1993 | 184 | VI | 42 | | 1 |
| 8 | И | ** | TEB | SAF | | 1999 | BH | | 4 GONFIDENTIAL D | R_00009 | 1 |
| 12 | W | 11 | SAF | MEA | : | 1995 | LV | 1/ | 37 | | H- |
| 13 | 11. | 11 | MIA | TEB | | 1996 | BH | | 24 | | |
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| 27 | 11 | 1 | TEB | BED | | 1999 | LV | | 9 1 | | 1 |
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| 29
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| 6 | | N908JE | Vag | VQQ | | 480 | H.G. | | 16 | | ++- |
| 8 | G-1159B | N9095E | TEB | BGD | | 2003 | вн | , | 8 8 | 4 | + |
| certify | that the statements ma | ade by me on this form a | re true. | | | | Page Total | 3/2 | 493 | | 00 |
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| e Aircraft Make | Aircraft | Points of Depar | ture & Avrival | Miles Flight | | Number | Aircraft Cate | gory | | _and Cla | 255 |
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| G-1159B | N909JE | BEP | TEB | 2004 | BH | | 10 | | | | |
| 3 Ir | 1) | TEB | ACY | 2006 | | | 6 | 58 | | | - |
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| 6-1159B | N969JE | TIST . | EWR | 2010 | LV. | | 42 | | | · | 1 |
| 1 11 | - 11 | EWR | SSI | 2011 | LV | | 20 | | | | |
|) b | 1) | SSI | TIST | 2012 | LV | | 29 | | | | |
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| 5 5-76 | N908GM | Mas | RWI | | | 1 | 24 | | 24 | | 1 5 |
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| 8 G-1159B | N90956 | TEB | TIST | 2014 | | | 35 | | | | -1-1- |
| K U | MIN. | TIST | TEB | 2016 | | <u> </u> | 34 | | | | |
| 5 11 | 1,0 | 7257 | TEB | 2617 | LV | 1/1 | 37 | | | A | -+- |
| 7 11 | N. | TEB | EINN | 2018 | | | 611 | | | · | \rightarrow |
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| 5 " | 16 | LLBG | LGIR | 2,621 | LV | | 15 | | | | -++ |
| rtify that the statements in | ade by me on this form o | ere true. | | | Page Total | 4/3 | | _ | | | |
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| | Date | Aircraft Make
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15 | G-1159B | NAOGJE | LGIR | LFPB | | 2022 | LV | | 34 | | 7 | | | _3 |
| | 29 | וו | 10-10-135 | LFPB | CYJT | | 203 | LV | 1/1 | 58 | | | | | 5 |
| | 29 | ¥1 | 1) | CYJT . | TEB | A | 2624 | 1.V | 1/1 | 2.5 | | | | | 2 |
| 5 10 | MAY | 16 | 11 | TIST | TEB | 1 | 2008 | BH | 1/1 | 41 | | 1 | | Á | 4 |
| | 22 | 4 | 11 | TEB | TIST | - | 2629 | LV | | 35 | 5 | 1 | | | 3 |
| | | BHT-467 | NYGIGM | LSJ | TIST | | | LV | | | | | 2_ \$ | | |
| | 26 | 11 | 11 | LST | LSS | | | NVA | | | 8 | 1 | 2_
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| | 27 | G-1159B | NGOGJE | TIST . | TEB | | 2630 | LV | 1/1 | 38 | | | | | 3 |
| | 29 | | NGOBJE | PBI | LCQ | | 483 | 1.V
3.H | | 0 | 27 74 | | | £ | - |
| | 29 | G-1159B | N909JE | TEB | MIV | | 2631 | BH | | 1 | ONFID | ENTIAL | _ DR_ | 000093 | - |
| | 31 | B-727-314 | The second secon | LCQ | VQQ | * | 484 | (4.8
(4.8 | | <u> </u> | | | | | - |
| | SOL | 6-1159B | | TIST | PPK | | 2634 | - BH | 1/) | 30 | | | | | 1 |
| | 11 | N | 110 | PDK | TEB | | 2,635 | 1817 | 1/ | 10 | | | 4 | | - |
| | JUL | B-727-31H | NGOBJE | VQQ | PBI | | 485 | BH | | (| | | | # | 1 |
| 1 1 | AUG- | B-727-200 | ST MULATOR | MIA | MEA | | | RAY MARZANA - FE PC
HAL LEXO-CREW, BUTCH GREACHEN-CREW | | 20 | _ | | | | + : |
| | 21 | G-1159B | NADAZE | PBI | PBI | | 204 | LV | | 111 | | | - 4 | | + |
| | 20 | 11 | (i) | Vi | " | <u> </u> | 2044 | LV | 3/3 | 1 1 | | | | | += |
| lli. | 22 | . V | 11 | 14 | SEF_ | L., | 2645 | | - | | | - | - 1 | 1 | + |
| | 22 | · · · | "11 | SEF | PBI | | 2546 | LV | | | 5 | 1 | 1 | - | - |
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| 2 <u>608</u> | and wickles | Identification Mark | From | То | Flown | No. | Maneuvers, Endorsements | 8 | of Landings | ALBREAM | K GLIDER | HGL2COPTER | SEL | MEL |
| 9 | B-727-31H | N908JE | PBI | LCQ | | 486 | | | (8) | 1 | 0 | | | 1 |
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3905 | G-1159B | SEMULATOR | DFW . | DEW | | | STALLS STOCK TURIUS, CERCI
MESSED APPROACH, V-1 | LENE APPRODULY,
CUT. HOT BLEED HON | TEMS | 3 | | | | 3 |
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| FEB | B-727-200 | 14:51 | MIA | MEA | 1 | 1 | HAL LAKE T NETRUMBE | Τ'n | | | 5 | | | 1 |
| ч | ni ni | t1 ₁₀ | 11 | 11 . | 1 | | PE PC-RAY BARZANA | b LV | | | 5 | Jets. | | 1 |
| 니 |): | II | 31 | 8/1 | - | | CAPTAIN WARMUP
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| 4 | 10" | v . | 11 | 1 | | | CHPTAEN PC- RAY BAK | RZAMO LV | - | | 5 | | | 1 |
| 28 | B-727-31 H | N908JE | LCQ | PBE | | 487 | | RZONO LY
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LY | 11. | | 5 | | 1 | 1 |
| MAR | G-1159B | N909JE | PBI | MANN | 1 | 2648 | | LV | 1/2 | | , | | | 1 |
| 7 | 17 | 11 | MANN | PBI | | 2649 | 1 | 1.V | | 1 - 1 | CONFID | ENTIAL DI | 3 000094 | 4 |
| MAY | 8-727-3114 | N908JE | PBI | PBI | - | 468 | | · LV | - | - | 3 | 10 E | | |
| 301 | G-1159B | N909JE | PBI | PBI | | 2650 | | . LV | | c | 1 | | | |
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| 5ep | 8-727-200 | SEMULATOR | MEB | MEA | | 2651 | | LV | | — . | 4 | | | +-: |
| 25 | 16 | 3 LAB CHICAC | In 3 | 1.1712 | \vdash | | | EM | - | | 5 | 1-1-1 | - | +- |
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| Contify that the statements made by me on this form are true. |
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2 | | to the state of th | From | То | Fisher No | Maneuvers, Endorsement | • | of Landings | | | HELICOPER | | Me |
| 2 | | NOOGE | 1 | TEB | 2.0 | n | LV. | 1/1 | 2 4 | | - HELLAPKA | | - |
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| 5 | | 33 | TIST | PBI | 20 | 4 | LV | | 29 | - | | | |
| 15 | B-727-200 | SPHULATOR | MIA | MIA | 1 | FE RECURIENT | RAY BARZOW | • | | | + | 4 | |
| 15 | 3.(| NC NC | ** | 11 | | CAPT RECURRENT | RAY BARZANNA | | 15 | - | | 1 | |
| 22 | G-1159 | N530GA | PBI | PTK | | JOHN ROBERTS | S MAC LEGIO | <u> </u> | 24 | | | 1 | |
| 2.5 | G-1)598 | N909JE | PBI | TEB | 2.6 | | LV | 1/1 | 25 | | +-+- | 1 | - |
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| 6 | 12-121-31H | N6082E | PBI | PBI | - 61 | 191 | B'A | | 15 | 1 | | | | 1 |
| 13 | G-1159B | NOBOLZE | | TIST | | 2086 | BH. | 1/1 | 24 | | | | | |
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| 29 | 8-72]-200 | SE MULATOR | MIA | MIA | | | LARRY MORRISON E MONTH & HECK | | 15 | 8 | | | | |
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| 25 | 11 | .11 | TEB | LFPB | | 2169 | LV | | 7 2 | | | | 72 | |
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| 25 | . 11 | 11 | TEB | PHX & | 1 | 2116 | LV | 1/1 | 47 | | | | 4- | 1 |
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| 26 | V1 | n | TEB | EGGP | | 2124 | DINERTED TO AUTERNATE LV | 1 | 65 | | | | 6 | 5 |
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| 27 | B-727-31H | N908JE | PBI | PBI | | 192 | | LY | 3/3 | 17 | | | | | \] | 1 |
| 29 | G-1159B | NGOGTE | TIST | EWR | | 2131 | V | LV | | 36 | | 1 | + | | 36 | |
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| 6 | G-1159B | N909JE | TEB | TEST | | 141 | 7 | | 1/ | | * * | | | | 3 | 5 |
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| 201 | and Model | identification Mark | From | To | Flown | No. | Maneuvers, Endorsements | of Landings | AZRIPLON | & GLINER | BURGOVE | 361 |
| MAR | G-1159B | N909JE | TIST | TEB | 9 | 215 | | 1/ | 4 | 1 | | |
| 30 | S-76C++ | N722JE | TEB | 4N1 | | | TWO CONSTITUTED TOWNSO LY | | | | 3 | 1 |
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| 26 | B-727-31H | N9083C | PBI " | BOK | | | TIM POWELL LV | U Use | 1 7 | ١. ا | | |
| 30 | G-1159B | NGOGIE | TIST | TEB | | 2159 | LV | V | 3 8 | SCONE | IDENTIAL | BD 00 |
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| 20 | 31 | M | GVAL | TIST | | มเร | . لــــل | | 61 | (| | - L |
| 22 | * \ I | 11 | T75T | TEB | | 264 | LV | 1/1 | 4 | 1 | | |
| 220 | BHJ-407 | NYPIGM | PBI-F45- | PBE | | | RANDY ROWLES - EXAMENGE | 7.5.7 | | | 16 | |
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| 26 | | N909JE | TIST | TGB | | 214 | LV | VI | 40 | | 1 | 1 - |
| 30 | M | 11 | TEB | PBI | | 2/67 | LV | | 2 | i | | - |
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| 700 | G-1159B | N909JE | PBI | TEB | 2 | 1168 | | LV | 1/1 | 2 | | | | | 24 | | 1 |
| 9 | 11 | 11 | TEB | ASE | 2 | 169 | | LV | | 3 9 | 7 | | | | 39 | | 1 |
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| 15 | 11 | . ,, | BFI | APC | 2 | 172 | | LV | | 1 (| 7 | | | | 1 16 | - L | 1 |
| 17 | VI . | 11 | APC | TEB | 1 | 217 | | LV | 1 | 51 | | | | | 51 | 1 | |
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| 25 | B-727-200 | SIMULATOR | MEA | MIG | | * | captaen warmup | | | 20 | | | | | 20 | 2 | _ |
| 25 | - 11 | 11 | 10 | 13/ | | | FG WARMUP | | | 20 | > | | ONFIL | ENTIAL | DKZ | 9102 | |
| 26 | 10 | . 11 | 11 | /11 | | | HARRY BROWN-GARMENER 1 | 25 | 00 | 10 | , | | | | 1 | 0 | |
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| 28 | G-1159B | NAMARE | TEB . | PBI | 2 | 2176 | 2 SAT ONZUNG SEDY | | | | 0 | | | | | 0 | - |
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| 3 | B-727-31H | NAOSZE | BOK | PBI | L | 194 | | LM | 1/1 | 11 | | | | | 1 | 7 | 1 |
| 31 | BHT-407 | NY91GM | T75T | LSJ | | | | LV | - | 1 | 1 | | 3 | | | 1 | * |
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| 21 | B-727-200 | BINULATOR | MIA | MIA | | | FECHECK RIDEPARS 125 LM | | 10 | I I I | OFFEK | 1 - | .10 | |
| 25 | N. | 11 | u | 10 | | | KEY MAY JAND HOLDENS LM | | 20 | H - | + | | 20 | |
| pac | 8-727-3118 | N908JE | PBI | PBI | | 445 | RUSH TEST FLEGHT LY | | 1 1/ | | +- 1 | | 16 | |
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| 18 | VI . | 11 | DIAP | GVAC | 190 | 2)47 | LV | 1// | 3// | CON | JEIDE | NTIAL DE | | - |
| 18 | 31 | 1 | GVAC | TIST | | 2)48 | | - | 36 | 100 | | | -003.12 | |
| 23 | BHT-467 | N4916M | LSJ | TIST | - | | LV | | | + | - | | +-14 | - |
| 24 | G-1159B | N909JE | TIST | PBI | | 2,199 | | | 2 9 | H | 2 | | 2 0 | |
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12 | G-1159 A | SIMULATOR | DEM | DFW | | | FMS APPROQUES, FMS HOURDAY COUN WK | | | | - | | 30 | |
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| 1 | 2012 | and Model | Identification Mark | From | To | Flown | No. | Maneuvers, Endorsoments | O Landings | AZRPLANC | GLIDER | HULICOPTER | SEL | MEL |
| 1 | MAR | B-727-31H | N908JE | LFPB | EGHL | | 501 | MASHAM | 1/1 | 10 | | | 1 | 10 |
| 30 8-727-200 SIMULITOR MEA MEA MEA MEA MEA MEA MEA MEAN MEAN M | APR | | N909JE | TEB | TIST | | 2207 | LV | | 37 | | | 1 | |
| 3 G-1/59 B N9093E T157 | 30 | B-727-200 | SIMULATOR | MEA. | MIA | | | FLIGHTENCINGER HOLDENG LV | | 40 | | | | |
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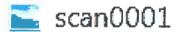
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| 18 | 4 | 11 | TEB | ABQ | - | 225 | LV | | 41 | | 1 | | 360 | |
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| 6 | 11 | 11 | PBI | TIST | 2 | 229 | LV | | 26 | | | + | 1 | +: |
| 24 | B-727-31H | | TIST | TEB | 2 | 230 | LV | V | 37 | | 1 | _ | | |
| 28 | | N908JE | EGHL | EGSS | 5 | 562 | Lasham to stansize I'm Bustkerke | / | 1 | | - | + | | + |
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| 12 | 1(. | -11 | - W | V 11 | | | Cholor by Horoene Chair Hereds | | | | - | - | 1 | - |
| 20 | | NAPALE | TEB | PBI | 2.2 | 235 | LV | | Çğ | 1FIDE | NTIAL | DR_ | 000105 | - |
| 25 | 11 | 11 - | PBI | MPW | 2 | 234 | LV | | 28 | | _ | + | i | H |
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| I certify : | hat the statements made | e by me on this form an | o true: | | | | | 6/4 | 27 | - | - | — | | 11 |
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| Date | Aircraft Make
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| 2013 | | | From | To | 11,500 | | A | | ALRPLAN | K GLIDGE | HOLECOPER |
| 7 | B-727-31H | NGOSJE | PBI | Bak | | 507 | PSKKY GREAVES-ENSTRUME JOE | 1/1 | 1 | 4 | |
| 13 | G-1159A | SEMULATOR | DFW | OFW | 1 | 1 | HOLOPAL FOUNDAIL | | 2 | 0 | |
| 14 | | 11 | , vi | 11 | | | Holdeng
Holdeng | 3/3 | 2 | 4 | |
| 16 | G-1159B | N909JE | TEB | PBI | 0 | 2.24 | | 1/1 | 3 | | |
| 18 | 11 | 16 | PBI | TEB | \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ | 224 | | • | | 3 | |
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| 19 | 14 | u | TIST | TEB | | 2252 | | 1/1 | 4 | | |
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| 25 | , t | " | TEB | ASG | | 2258 | LV | 1/1 | 4 | 3 | |
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| 29 | 11 |)1 | TUL | VNY | 4 | 2261 | با | | 3 | | |
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MAY | - 17 | - 11 | VNY | TEB | | 2212 | | 1/ | 4 | 1 | |
| West | , W | - 31 | TEB | TIST | | 2263 | LV | | 3 8 | | |
| 12 | , ii | 11 . | TIST | PBI | 1_ | 2764 | Marphy | | | 7 | |
| I certif | that the statements ma | ade by me on this form | are true. | | | | Page Total | 14/12 | 57 | | 4 |
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| | Date | Aircraft Make
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| Ν. | 15 | G-1159B | NADAZE | PBI | TIST | | 2265 | LV | | 23 | 3 | | | | 1 7 |
| | 22 | - 11 | · vi » | TIST | ISP . | | 226 | PARKEN ROTHCLL | 1/1 | 3 6 | | | | | 1 |
| 9 | 24 | - 11 | st. | ISP | TEB | 200 | 2267 | LV | 1/1 |) [8 | | | | | 1 |
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| 3 | 3 | и | N | TIST. | ISP | A | 2269 | LV | 7371 | 3 | t | | | | |
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| - 1 | 15 | 11 | n | LFPB | LPAZ | | 2271 | LV | | 3 | | | | | 1_ |
| | 16 | V | · M | LPAZ | TIST | - | 2272 | . LV | | 56 | , | | N. S. | | |
| | 24 | N. | *1 | TIST | TEB | P | 2273 | LV | W | 3 9 | | | | | |
| 3 | JUL | . 11 | M. | TIST | TEB | | 2276 | BINARO | 1/1 | 3 8 | | | | | |
| | 19 | W | 11. | TEB | BED | | 2277 | LV | | C | | | | | |
| _ | 19 | - N | 1 11 2 | BED | TFST | | 2276 | · Lv | | 30 | ONFID | ENTIA | L DR | 000107 | |
| | 25 | - 11 | 13 | TIST | PBI | | 2279 | LV | 1/1 | 26 | | | | | |
| 7 | 26 | VC. | VI - | PBI | TEB | | 22.60 | LV | | 25 | | | | | |
| 1 | ALG | N | 11 | TEB | ABQ | | 228 | MINANGO
ODMANGO | 1/1 | 47 | | | | | |
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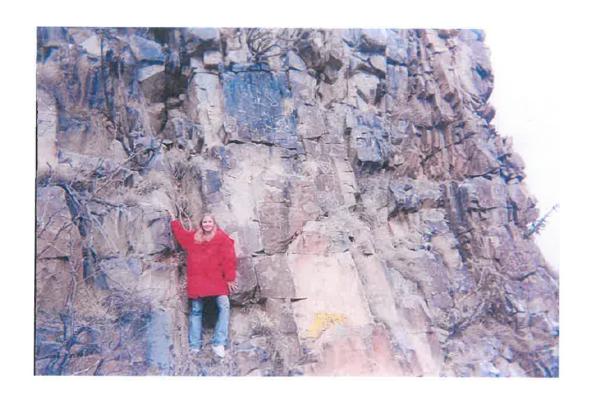
























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/-- ... ---/มาน พ.ร้างคลาน ล. เมือง จ. เชียงใหม่ 50100 โทร. (053) 281033-6 แฟกซ์ 281044



ROOM SERVICE

| | | | ทะเบีย | นการถ้า | เลขที่ 50 | 14 | 2827 |
|-----------|---------|---------------------|--|------------------------------|-------------------------|------|-------------------|
| WAI
O& | TER NO. | PERSONS | TABLE
0123 | NO. | Nº | | 0,
09 8 |
| | DETAILS | | | AMOU | NTS | | |
| | | 5 | R00M-B/F | | | | |
| FOOD | 820 00 | TBL | 923/1 CH | K 209 |
8 | GST | |
| VAT | 21.61 | West and a state of | 090CT | | | u., | 7 |
| SERV.06 | 32.00 | 4 | COFE/TEA/M | | 328
320 | | T |
| TOTAL | 376 bA | | VAT 7%
SERVICE
TOTAL DUE | | 24
32 | .64 | |
| | | TIN
RD# | 923
923/ROBERT
HOTEL GUES
RECIEVABLE
3 10
5014
5 CHECK C | T
02:
1 617:
22 00: | 1009-02
70-2
0232 | -002 | 78 |

PAID-CHARGES

NAME: V 9 W CO ROOM NO. 9 3

ADDRESS:
SIGNATURE

112 ถ. ช้างคลาม พ.ช้างคลาน ข. เมือง จ. เชียงใหม่ 50100 โทร. (063) 281033-6 แพ่กซ์ 281044



ROOM SERVICE

| | | | ทะเบ | ซนการคำ | เถขที่ 5 | 0 14 2827 |
|---------|---------|------------|---|------------------------------|----------------------|--------------|
| WAI | TER NO. | PERSONS | TABLE | NO. | CHE | CK NO. |
| 0 | 62 | 7 | 923 | , | No | 32106 |
| | DETAILS | | | AMOU | NTS | |
| | | 5 | ROOM-B/F | | | |
| Food | 110.00 | TBL | 923/1 C | W 240 | | Physical P. |
| VAT | 8.17 | | | 02 06 | | 95T 1 |
| SERVICE | 11 - 00 | 3 | FRENCH FRI | IES | | 0.00 T |
| TOTAL | 120.27 | | VAT 7%
SERVICE
TOTAL DUE | | 1 | 3.47
1.00 |
| | | TIN
RD# | 923
923/ROBERT
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22 000 | 010-02
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PAID—CHARGES

NAME:—
ROOM NO. C. C. NO.

ADDRESS:—

SIGNATURE

ห. ส.ช้างคลาน อ. เมือง จ. เชียงใหม่ 50100 โทร. (063) 281033-6 แพ่กซ์ 281044



| | | ทะเบียง | เการถ้าเล | บที่ 50 14 | 2827 |
|--------------|------------|-----------------------------------|-------------------------|--|-------------|
| WAITER NO. | PERSONS | TABLE 923 | | CHECK 3 | NO.
2117 |
| DETAILS | 3 | | AMOUN' | TS | |
| Front @ 12 | 0 5 | ROOM-B/F | - | N oliki kirin pirangali dan daga napag | |
| Sev. 101. 13 | | 1/64 ()
130CT (| | 444 | ST 1 |
| Vat. 4/2/0.0 | 2/ 1 | F RICE PORK
FOOD TOTAL | CHIC | 130.00
130.00 |) |
| (F) /59.0/ | | VAT 7%
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TOTAL DUE | 15 | 10.01
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3.01 |) |
| 37 70 | | 923
923/ROBERTS
HOTEL GUEST | | 452.04 | 4 |
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| PAID- | CHARGES | | 1) | | | |
|------------|---------|----|-----|----------|----|---|
| NAME:- ` | Grames | No | Ry | ROOM NO. | 42 | 3 |
| ADDRESS :- | Ü | | | | | |

112 อ. ร้างคลาน พ.ษ. ีลาน อ. เมือง จ. เชียงใหม่ 50100 โทร. (063) 281033-6 แฟกซ์ 281044



SIGNATURE

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กาเ | ม
เกขท 50 14 2827 |
|----------------|------------|----------|--|------------|-----------------------------------|
| WAITER NO. | PERSONS | | TABLE NO. | _ | CHECK NO.
Nº 32129 |
| DETAILS | | | АМО | ου | NTS |
| Food @ 250 | 5 | ROO | M-B/F | | |
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RICE PORK CH
OD TOTAL | 110
800 | 130.00 T |
| Pot 294.2 | 5 | VA
SE | T 7%
RVICE
TAL DUE 12 | 23 | 250.00
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| | | | CHECK CLOSE | .u | 05.00HI |
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| NAME: | la Pa | E | ROOM NO. | ζ | 103 |
| ADDRESS : | - | | | | |

112 a. ช้างคลาน ค.ชางคลาน ย. เมือง จ. เชียงใหม่ 50100 โทร. (053) 281033-6 แฟกซ์ 28104¢



Swimming Pool

| WAITER NO. | PERSON | TABLE NO | . CHECK NO. Nº 23621 |
|------------|------------|--|---|
| DETAILS | | AMO | DUNTS |
| | 13 | POOL-PM. | |
| | TBL | 1/12 CHK 6
160CT '02 0 | 21 G5T 1
3:23PM |
| | 1 | MATER
BEVR. TOTAL
VAT 7%
SERVICE
TOTAL DUE | 25.00 T
25.00
1.93
2.50
29.43 |
| | TIN
RD# | 923
923/ROBERTS
HOTEL GUEST
RECIEVABLE 0
3 10 1 61
5014 22 0
13 CHECK (1.05E | 21016-02-00630
770 2
00232 |

| PAID-CHARGE | S ~. | | |
|-------------|------------|-----------|------|
| NAME:- | | ROOM NO. | Os . |
| Miguria | · F Storet | C. C. NO. | 123 |
| ADDRESS:- | | | |
| | | | |
| SIGNATURE | | | |

GIUFFRE007417 CONFIDENTIAL 1/2 ถ. ช้างคลาน พ.ช้างคลาน อ. เมือง จ. เชื่องใหม่ 50100 โทร. (053) 281033-8 แฟกซ์ 281044



| C | | ทะเบีย | นการคา | เถาที่ 50 | 14 1 | 8827 |
|----------------------------------|-------------------|--|------------------------------|-------------------------|---------------------|------|
| WAITER NO. | PERSONS | TABLE | NO. | | CK N | |
| DETAILS | | | AMOU | NTS | | / |
| Fact @ 240 | 5 F | 800M-8/F | | | | |
| Sev 107. 24.00
Vat y 1. 18.48 | TBL | 923/1 0
160071 | | | GST | 2 |
| Pol. 282.48 | 2 | FRIED SPRI
FOOD TOTAL
VAT 7%
SERVICE
TOTAL DUE | | 247
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| PAID-CI | HARGES | |
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| ADDRESS : | | |
| SIGNATURE | 1/ besser | 1200 |

312 ณ ช้างคลาน ช้างคลาน อ. เมือง จ. เชียงใหม่ 50100 โทร. (053) 281033-6 แพ่กซ์ 281044



ROOM SERVICE

| | | | ทะเบียนก | าารถ้า | เถขที่ ธ | 14 2 | 827 |
|------------|--------------|----------------|---|-------------------|------------------------|------------------------------|-----------|
| WAITER NO. | PERSONS
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Nº | 32° | o.
147 |
| DETAILS | | AMOUNTS | | | | | |
| | 5 | ROG | M-B/F | | | | |
| | TE | L 92 | 3/1 CH
160CT10 | K 14 | 17
11379M | 9ST | 3 |
| | ; | FO
VA
SE | MILY SREA
OD TOTAL
T 7%
RVICE
TAL DUE | | 78
6 | 0.00
0.00
0.06
8.00 | Y |
| | FIN
RD# | HO'
REI | 3/ROBERTS
TEL GUEST
CIEVABLE
3 10 1 | 02
617
2 00 | 1016-0
70 2
0232 | | 17 |

PAID—CHARGES

NAME:—

ROOM NO.

C. C. NO.

SIGNATURE

12 ถ.ชา 🧠 🧸 ศ.ช้างคลาน อ. เมือง จ. เชียงใหม่ 50100 โทร. (053) 281033-6 แฟกซ์ 281044



ROOM SERVICE

| | | ทะเบียน | การคำเลข | n 50 1 | 4 2827 |
|------------|---------------------|--|---------------------------|--|----------------|
| WAITER NO. | PERSONS | TABLE 1 | | CHECK | NO.
3216 |
| DETAILS | | AMOUNTS | | | |
| | 5 R | 00M-8/F | | | |
| | TEL | 923/1 CH
170CT '0 | | | GST 0 |
| | | TOST/DNIS/C
FOOD TOTAL
VAT 7/4
SERVICE
TOTAL DUE | | 80.0
80.0
6.0
8.0
4.1 0 | 00
16
00 |
| | ACC I
TIN
RB# | 923
923/ROBEPTS
HOTEL GUEST
RECIEVABLE
3 10 1
5014 2: | 02101
61770
2 00023 | 2
)2 | 00675 |

PAID-CHARGES

NAME:
ROOM NO.

C. C. NO.

ADDRESS:
SIGNATURE

112 ถ น ค.ซ้างคลาน อ. เมือง จ. เชียงใหม่ 50100 โทร. (063) 281033-8 แพ่กซ์ 281044



ROOM SERVICE

| | | ทะเบีย | เการถ้า | เถขที่ ธด | 14 : | 2827 |
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No | CK N | |
| DETAILS | | AMOUNTS | | | | |
| | 9 | R00M-8/F | | | | |
| | TBL | . 923/1 - Q
1700710 | | | 351 | 0 |
| | 1 | COFE/TEA/MI
FOOD TOTAL
VAT 7%
SERVICE
TOTAL DUE | | 8 | 1.30
1.00
5.45
3.00
1.6 | Ī |
| | FIN
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923/ROBER IS
HOTEL GUEST
RECIEVABLE
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NAME TOOM NOT C. C. NO. C. C. NO. C. SIGNATURE

SIGNATURE

ส. ช้างคลาน พ.ช้างคลาน อ. เบือง จ. เชียงใหม่ 50100 โทร. (063) 281033-6 แฟกซ์ 281044



| WAITER NO. | PERSONS | 3 | TABLE NO. | CHECK NO. 32160 | |
|------------|---------|-------------------------|---|---|--|
| DETAILS | | | AMOUNTS | | |
| | Ş | R00 | M-8/F | | |
| | 78L | . 92: | 3/1 CHK 216
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| | | OR
FOO
VAT
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GR TO JUICE
OD TOTAL
F 7%
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26.00 | |
| | IP | HOT
REC | 3
3/ROSERTS
TEL 0UES
DIEVABLE 02
0 10 1 517
5014 22 00
CHECK CLOSED | JU 17-02-00670
70 - 2
1232 | |

| PAID-CHARGES | | |
|--------------|---------|---------------|
| NAME : | Z 1 1 | ROOM NO. |
| Miguea | Notinta | C. C. NO. 12) |
| ADDRESS:- | | \cap |
| 1 | |) (|
| SIGNATURE / | symma | Roberto |

112 ถ. ช้างคลาม พ.ช้างคลาน อ. เมือง จ. เชื่องใหม่ 50100 โทร. (063) 281033-6 แฟกซ์ 281044



| CHIANG MAI | | | |
|-------------|-----------|--|---|
| | | ทะเบีย | เการกาเลขที่ 60 14 2827 |
| WAITER NO. | PERSONS | | NO. CHECK NO. |
| DETAILS | | | AMOUNTS |
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FOOD CITAL
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19 .25
25 .00 |
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5014 2 | |
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| PAID-CHARGE | Sy | S ROOM N | 10. all 3 |
| Lolso- | 1 Civille | C. C. NO | |
| ADDRESS:- | | .// | |
| | 1 1 | | |

.คลาน ค.ช้างหลาน อ. เมือง จ. เชียงใหม่ 50100 โทร. (063) 281033-6 แฟกซ์ 281044



| | | n | ะเบียนการเ | ้าเถขที่ ธ | 0 14 2827 |
|------------|-------------------|--------------------------------------|-----------------------------|--------------------------------------|----------------------|
| WAITER NO. | PERSONS | | BLE NO.
423 | CHE
Nº | CK NO.
32172 |
| DETAILS | | | AMOUNTS | | |
| | - | PYOM-E | | | |
| | r _{os} . | 923/1
180 | CHK 1
ICT:02 0 | | |
| | 2 | FOST/DN
FOOD
VAT 7%
SERVICE | Tik. | 1 | 1.30
2.32
€.30 |
| | TIN
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50 1 51
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776-1
- J232 | |

| PAID-CHARG | ES | | |
|------------|------------|----------|-----|
| NAME: | 1.0 | ROOM NO. | 90 |
| 1 - CK)- | or I Carlo | C.C. NO. | - 4 |
| ADDRESS :- | 11/ | | |
| SIGNATURE | MA | 1000 | |

312 ถ. ชั่วงกลาน ค.ช้างกลาน อ. เมือง จ. เชียงใหม่ 50100 โทร. (053) 281033-8 แฟกซ์ 281044





TIN 3 10 1 61770 2 -D# 5014 22 000232 ----1 CHECK CLOSET 18:50AM----

ทะเบียนการก้าเลขที่ 60 14 2827 WAITER NO. **PERSONS** TABLE NO. CHECK NO. Nº 263581 1 a DETAILS **AMOUNTS** 3 0/5-8/F OHK 532 1800T'02 08:379m TBL 974 951 1 1 0.8.F. 200.00 FOOD TOTAL 15,40 20,00 VAT 7% SERVICE. TOTAL DUE 235,40 795 15 TERROR HOTEL GUEST 235.40 ACC RECIEVABLE 021018-02-00755

| PAID-CHARGES | |
|-------------------|----------------|
| NAME : | ROOM NO. 🧡 Ø 👶 |
| DAG RANGNE | C. C. NO. |
| ADDRESS:- | |
| | |
| SIGNATURE DO CL C | Rangnes |

112 m. ข้างคลาน ค.ข้างคลาม อ. เมือง จ. เขียงใหม่ 50100 โทร. (053) 281033-6 แฟกซ์ 281044



Swimming Pool

| | | | ทะเบียน | การคำ | เถขที่ ธ | 0 14 | 2827 |
|------------|------------|-----------------------------|--|----------------------|--------------------------------|------------------------------|------------|
| WAITER NO. | PERSONS | 3 | TABLE | | | ск
23 | NO.
629 |
| DETAILS | | | | AMOU | NTS | | |
| | 12 | POOL | -AM, | | | | |
| | TBL | | CH
170CT '8 | | | GST | 2 |
| | 1 | SOFT
BEVR
VAT
SERV | HA BEER
DRINKS
. TOTAL
7%
ICE
L DUE | | 50
160
12
10 | 0.00
0.00
2.32
6.00 | |
| | TIN
RD# | HOTE
RECI | BROWNLII
L GUEST
EVABLE
3 10 1
5014 2: | 621
5177
2 000 | 189
1917-02
1912
1232 | | |

| PAID-CHARGES | |
|--------------|--------------|
| NAME:- | ROOM NO. 907 |
| M. MCINTYRE | C. C. NO. |
| ADDRESS:- | |
| SIGNATURE | 1 1 |
| M Ma | Intre |

| วนที่และเวลาที่เ | ชื่อ/Name VV O | นริการปกติ Regular Service ปริการด้วน (เพิ่มคำบริการ s Express (50% Surcharge) อังไม่ต้องส่งค้า To Hold | | | | | | | | | | | | | | | | จำนวนที่ จำนวนที่
พันณะผล เก็บเกล่า | MANDATING-110 |
|---|----------------|--|--------|-------------|-----------------------|------------------|----------------------------|------------------------|-----------------------|--------------------------|------------------|--------------------------|---------------------|-----------------|-------------------------------|----------------------------------|-----------|--|------------------|
| กาคมกา | 000m | ervice
(Initus
0% Su | | | | | | | (NO | V | জ | | | 0 | | 9 | Office | นับแหล
สามารถ | S |
| วนทและเวลาทั่วแคนหอง/Your Departure Date & Time | ainia Toberts | บริการปกติ Regular Service Regular Service บริการท่าน (พื้นสำนริการ 50%) Express (50% Surcharge) To Hold To Hold Regular Service Shirts to be returned พัน Folded อังไม่สัดสหัสท์ To Hold Hanger | | ซีพา/Other | พุคชาฟารี/Safari Suit | ชุดนอน/Pyjamas | เสื้อกันหมาว/Coat (Cotton) | กางเกงชั้นใน/Underpant | เพื่อกล้าม/Undershirt | กางเกษาสิ้น/Shorts | ณฑั 1 g/Socks PR | ผ้าเช็ดหน้า/Handkerchief | mwinamem / Trousers | เสียชีค/T.Shirt | เสียแชนสาว/Shirt-long sleeves | เสื้อแชนส์น/Shirts-short sleeves | GENTLEMEN | ACUMULE | JRY |
| | | | | | 150 | 90 | 100 | 30 | 30 | 60 | 25 | 20 | 90 | 60 | 80 | 70 | | | |
| | 903 | Delication | | | | | | 0 | 00 | 8 | 500 | | | 100 | | Con! | Amount | ที่มะเหล่ | |
| [5] | | 0 | | | | | | | | | | | | | | | Guest | กันแก่
สามารถ | |
| Laundry Mark: | The Land | 4 | | | | 2 | | | | | তা | | - | _ | | | Office | พักการ
เก็บการ | 1971 CA. 140. |
| ark | I Instructions | | | อื่นๆ/Other | กระโปรงขึ้นใน/Slip | กานเพชินใน/Panty | เพียชันใน/Brassieres | เสียคลุม/Gown & Robe | tauau/Pyjamas | ผ้าเชิดหน้า/Handkerchief | กางเกงสดรี/Slack | กระไปร4/Skirt | temniny/Pant Suit | เขียยตรี/Blouse | เสียนอก/Jacket | ชุดดิตกัน/Dress | LADIES | THEWILL IS | |
| | lace seases | iotal Amount 10% คำบริการ 10% Service Charge 7% คำบาชี 7% Government Tax | ยอดราม | Other | | 4 | 4 | 2 | 50 | 2 | 9 | 100 | 120 | 7 | 100 | 130 | IES | 1895 | , C. 114.00 INC. |
| | To lo Ren | | | - | 8 | 40 400 | 45 | 90 | 8 | 20 | 90 | - | ľ | 70 | H | ŏ | Αm | g. | CHOCO |
| | IA. | 1910.40 | 707 | | | E | | | | | 250 | | | 3 | | | Amc int | ชำ วนเสิน | (|

บริษัทรอยัล ปริ๊บเซล จำกัด (มหาชน) สาขาไรงแรมรอยัล ปริ๊บเซส เชียงใหม่ 112 ณช้างคลาน ต.ช้างคลาน อ.เมือง จ.เชียงใหม่



เลขประจำตัวผู้เสียภาษี 3 10 161770 2

MINI BAR LIST ROYAL PRINCESS

CHIANG MAJ

NO. 41607

BEVERAGES AVAILABLE IN YOUR REFRIGERATOR

CEVI

| PAR
STOCK | CONTENTS | UNIT PRIC | | TOTAL |
|--------------|------------------------|-----------|---------|-------|
| | | | 1000 | DANI |
| 2 | Singha Beer (Small) | 100 | | |
| 2 | Heineken Beer | 110 | | |
| 2 | Soda Water | | | |
| 1 | Coca-Cola | 50 | | |
| | Mineral Water | 50 | 1 | 50 |
| | Willerdi Avatel | 60 | 2 | 120 |
| 1 | Brandy V.S.O.P. 20 cl. | 550 | | |
| 1 | Scotch Whisky 20 cl. | 400 | | |
| _ 1 | Thai Whisky | 130 | | |
| 1 | Gin 20 d. | 400 | | |
| 1 | Vodka 20 cl. | 400 | | |
| 4 | Chocolate Bar | 60 | 1 | 120 |
| 1 | Potatoes Snack | 40 | | 120 |
| 2 | Singha Water | Compli | nentary | |
| | | | | |
| | | A | | |

| DIFFEE | | | | |
|--------|------|-----|-----|------|
| PLEASE | DO I | NOT | PAY | CASH |

| Guest's signature | |
|-------------------|----------------------|
| | Front Office Cashier |

บริษัทรอฮัล ปริ้นเซล จำลัด (มหาชน) ธาชาโรงแรมรอฮัล ปริ้นเซล เชียงใหม่ 112 ถ.ช้างคลาน ต.ช้างคลาน อ.เมือง จ.เชียงใหม่



เลขประจำตัวผู้เสียภาษี 3 10 181770 2

MINI BAR LIST

ROYAL PRINCESS
CHIANG MAI

NO. 41678

BEVERAGES AVAILABLE IN YOUR REFRIGERATOR VETO

| PAR
STOCK | CONTENTS | UNIT PRICE | CONSUMP- | TOTAL
BAHT |
|--------------|------------------------------------|------------|----------|---------------|
| 2 | Singha Beer (Small) | 100 | | |
| 2 | Heineken Beer | 110 | | |
| 2 | Soda Water | 50 | | |
| 1 | Coca-Cola | 50 | | |
| 2 | Mineral Water | 60 | 1 | 60 |
| 1 | Brandy V.S.O.P. 20 cl. | 550 | | |
| 1 | Scotch Whisky 20 cl. | 400 | | |
| 1 | Thai Whisky | 130 | | |
| 1 | Gin 20 cl. | 400 | | |
| 1 | Vodka 20 cl. | 400 | | |
| 4 | Chocolate Bar | 60 | 1 | 60 |
| 1 | Potatoes Snack | 40 | | |
| 2 | Singha Water | Compli | mentary | |
| | | | | |
| ces are i | nclusive of service charge and VAT | 4 | TOTAL | 120 |

| PLEASE DO NOT PAY CASH | |
|------------------------|---|
| Guest's signature | *************************************** |
| Refilled by | Front Office Cashier |

บริษัทรออัล ปริ้มเชธ จำกัด (มหาชน) สาขาโรงแรมรอธัช ปริ้มเชล เชื่องใหม่ 112 ณธั้งเคลาน ค.ชั้งเคลาน ถ.เมือง จ.เชื่องใหม่



เลขประจำตัวผู้เสียภาษี 3 10 161770 2

MINI BAR LIST ROYAL PRINCESS

NO. 41854

| BEVERAGES AVAILABLE IN YOUR REFRIGERATOR | |
|--|----------|
| | ppd () |
| NAME ROOM NO 983 DATE | 16-10-45 |

| NAME . | F | ROOM NO! | DATE | 16-10 |
|--------------|-------------------------------------|------------|------------------|---------------|
| PAR
STOCK | CONTENTS | UNIT PRICE | CONSUMP-
TION | TOTAL
BAHT |
| 2 | Singha Beer (Small) | 100 | | |
| 2 | Heineken Beer | 110 | | |
| 2 | Soda Water | 50 | | |
| 1 | Coca-Cola | 50 | | |
| 2 | Mineral Water | 60 | 1 | 60 |
| 1 | Brandy V.S.O.P. 20 cl. | 550 | | |
| 1 | Scotch Whisky 20 cl. | 400 | | |
| 1 | Thai Whisky | 130 | | |
| 1 | Gin 20 cl. | 400 | | |
| 1 | Vodka 20 cl. | 400 | | |
| 4 | Chocolate Bar | 60 | 2 | 120 |
| 1 | Potatoes Snack | 40 | | |
| 2 | Singha Water | Compli | mentary | |
| | | | | |
| | | | | |
| ces are | inclusive of service charge and VAT | onk | _TOTAL | 180 |

| PLEASE DO NOT PAY CASH | |
|------------------------|--|
| Guest's signature | |
| Refilled by | |

นริษัทรอยัล ปริ้นเชอ จำกัด (มหาชน) สาธาโรงแรมรอยัล ปริ้นเชอ เชียงใหม่ 118 0.ช้างคลาน ค.ช้างคลาน อ.เมือง จ.เชียงใหม่



เลขประจำตัวผู้เสียภาษี 3 (0 161770 2

MINI BAR LIST

ROYAL PRINCESS

NO. 41858

BEVERAGES AVAILABLE IN YOUR REFRIGERATOR WEST

| PAR
STOCK | CONTENTS | UNIT PRICE | | TOTAL
BAHT |
|--------------|------------------------|------------|---------|---------------|
| | | | | |
| 2 | Singha Beer (Small) | 100 | | |
| 2 | Heineken Beer | 110 | | |
| 2 | Soda Water | 50 | | |
| 1 | Coca-Cola | 50 | | |
| 2 | Mineral Water | 60 | | |
| 1 | Brandy V.S.O.P. 20 cl. | 550 | | |
| 1 | Scotch Whisky 20 cl. | 400 | | |
| 1 | Thai Whisky | 130 | | |
| 1 | Gin 20 cl. | 400 | | |
| 1 | Vodka 20 cl. | 400 | | |
| 4 | Chocolate Bar | 60 | 2 | 120 |
| _ 1 | Potatoes Snack | 40 | | |
| 2 | Singha Water | Complin | nentary | |
| | | | | |
| | | à | | |

| PLEASE | | |
|--------|--|--|
| | | |
| | | |

| Guest's signature. | |
|--------------------|----------------------|
| | Front Office Cashier |

บริษัทรอยัล ปริ้นเชส จำกัด (มหาชน) สาธาโวงแรนรอยัล ปริ้นเชส เสียงใหม่ 112 ณช้าจคธาน ต.ช้างคลาน อ.เมือง จ.เสียงใหม่



เลขประจำตัวผู้เสียภาษี 8 10 161770 🗷

MINI BAR LIST ROYAL PRINC

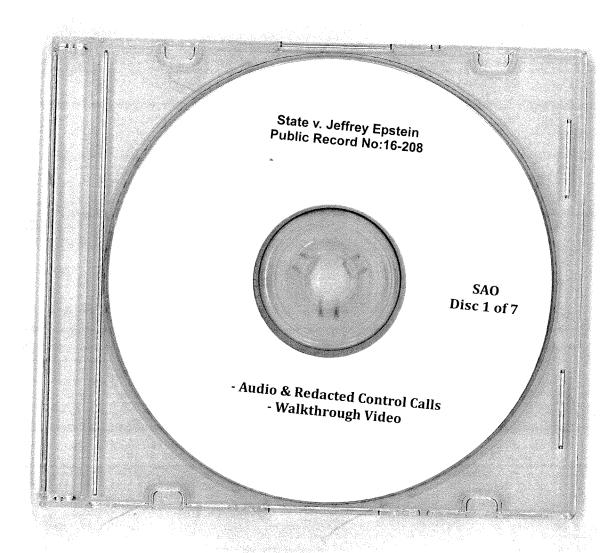
NO. 41943

BEVERAGES AVAILABLE IN YOUR REFRIGERATOR

| PAR
STOCK | CONTENTS | UNIT PRICE | CONSUMP-
TION | TOTAL
BAHT |
|--------------|------------------------------------|------------|------------------|---------------|
| 2 | Singha Beer (Small) | 100 | | |
| 2 | Heineken Beer | 110 | 1 | 110 |
| 2 | Soda Water | 50 | | |
| 1 | Coca-Cola | 50 | 1 | 50 |
| 2 | Mineral Water | 60 | | |
| 1 | Brandy V.S.O.P. 20 d. | 550 | | |
| 1 | Scotch Whisky 20 cl. | 400 | | |
| 1 | Thai Whisky | 130 | | |
| 1 | Gin 20 d. | 400 | | |
| 11 | Vodka 20 cl. | 400 | | |
| 4 | Chocolate Bar | 60 | | |
| 1 | Potatoes Snack | 40 | | |
| 2 | Singha Water | Compli | mentary | |
| | | | | |
| | | 1 | | |
| ces are i | nclusive of service charge and VAT | 914 | TOTAL | 160 |

| PLEASE DO NOT PAY CASH |
|----------------------------------|
| Guest's signature |
| Refilled by Front Office Cashier |

| Case 18-2868, Document 283, 08/09/2019, 2628241, Page837 of 883 | |
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| EXHIBIT 44 | |
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| (Filed Under Seal) | |
| (11100 011001 2001) | |
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| Case 18-2868, Document 283, 08/09/2019, 2628241, Page839 of 883 | |
|---|--|
| EXHIBIT 45 (Filed Under Seal) | |
| | |
| | |

anned

VEHICLES

| Mercedes Benz 600
2001 Black
Licence: EO3PRU
Lic: U90 -BQL 70/198 | (561) 309-6415 Rear
(561) 379-9390 Front | Mercedes Benz of Palm Beach
4000 Okeechobee Boulevard
West Palm Beach, FL 33409
Att: Shawn Adison
Tel: (561) 689-6363 |
|--|--|---|
| Mercedes Benz 600
1997 Black
Licence: G14KCT | (561) 758-1672 Rear
(561) 818-8867 Front | |
| Mercedes Benz 600 Conv
1998 Silver
Licence: RAS85L | (561) 346-7141 | Paint WORK & BODY SAN
CONTACT DOMINIQUE |
| Suburban
2001 Black
Licence: WGE53R | (561) 371-1686 | Roger Dean Chevrolet
2235 Okeechobee Boulevard
West Palm Beach, FL 33409
Tel: (561) 683-8100 |
| Crysler Mini Van
1996 White
Licence: WGE52R | (561) 308-5700 | Nestor Auto Repairs
2600 Florida Avenue
West Palm Beach, FL 33401
Tel: (561) 835-0809 |
| Cobra Grand
1993 Green
C97CRJ | | Nestor Auto Repairs
2600 Florida Avenue
West Palm Beach, FL 33401
Tel: (561) 835-0809 |
| Volvo
1998 Gold
Mrs Epstein | (561) 686-3707 | Volvo Palm Beach
5544 Okeechobee Boulevard
West Palm Beach, FL 33417
Tel: (561) 471-7600 |
| Oil Well | 900 Southern Boulevard
West Palm Beach, FL 33405
Tel: (561) 835-9374 | Oil change every 3 000 miles |

Registration, insurance and yearly inspection papers to be kept in the glove compartment of each vehicle Spare keys are kept in the key box in the office

02/11/2015

Page 2296

Public Records Request No.: 16-268

| Muvico Parisian | City Place
545 Hibiscus Street
West Palm Beach, FL 33401 | |
|-----------------|--|--|
| | Tel: (561) 833-0400 | |

GROCERY STORES

| Bishop Water Co | Tel: (561) 582-1367 Ghane' | bottled water (large and small) |
|---------------------|--|---------------------------------|
| Carmine Giardini's | 2401 PGA Boulevard, Suite 172
Palm Beach Gardens, FL 33410
Tel: (561) 775-0105 | Fish, meat, gourmet foods |
| C'est Si Bon | 280 Sunset Avenue
Palm Beach, FL 33480
Tel: (561) 659-6503 | Gourmet foods |
| Publix Super Market | 265 Sunset Avenue
Palm Beach, FL 33480
Tel: (561) 655-4120 | General, cleaning, toiletries |
| Wild Oats | 7735 South Dixie Highway
West Palm Beach, FL 33405
Tel: (561) 585-8800 | Health Foods |

HEALTH & BEAUTY

| Pharmacy | Greens Pharmacy 151 North County Road Palm Beach, FL 33480 Tel: (561) 832-4443 | |
|----------|---|--|
| | Lewis Pharmacy 235 South County Road Palm Beach, FL 33480 Tel: (561) 655-7867 | |

02/11/2015 Page 2297 Public Records Request No.: 16-268

UTILITIES

| Water | City of West Palm Beach
226 Cypress Lane
Palm Springs, FL 33461
Tel: (561) 965-5770 | Water shut-off for entire property is located next to the mailbox on the sidewalk. |
|---------------|--|--|
| Electricity | Florida Power and Light
General Mailing Facility
Miami, FL 33188-0001
Tel: (561) 697-8000 | |
| Gas | Florida Gas Company
401 South Dixie Highway
West Palm Beach, FL 33401
Tel: (561) 832-0872 | |
| Sewer | City of West Palm Beach
226 Cypress Lane
Palm Springs, FL 33461
Tel: (561) 965-5770 | |
| Trash Removal | City of West Palm Beach 226 Cypress Lane Palm Springs, FL 33461 Tel: (561) 965-5770- Water W | Daily (Monday-Friday) Recycelolos (Thurs bol Noor) omard |
| Telephone | ETC
2921 N Australian Avenue
West Palm Beach, FL 33407
Tel: (561) 881-8118 | , in |
| | Bell South Tel: (561) 780-2611 | |

| Plumber General PLUMBING 561-585-2591 | Foster Plumbing
2800 Westgate Avenue
West Palm Beack, FL 33409
Tel: (561) 686-1721 | General plumbing repairs |
|--|---|--|
| | Roto Rooter
6600 NW 12th Avenue, Suite 213
Fort Lauderdale, FL 33309
Tel: (561) 832-1495 | Blocked drains |
| Pool | Hackl Pools 1331 Central Terrace Lake Worth, FL 33460 Tel: (561) 588-7493 | Monday and Thursday at 10:30am Clean pool, filter, add |
| Tree Trimming | County Wide Tree Service Tel: (561) 371-5786 | First Monday in May and November |

| Storage USA | 5580 Okeechobee Boulevard
West Palm Beach, FL 33417 | 10 ft x 20 ft unit available | |
|-------------|--|------------------------------|--|
| | Tel: (561) 683-9955 | | |

VEHICLES

| Car Detailing | Palm Beach Wash & Auto Detail 1229 N. Dixie Highway (at Ameco Gas) |
|---------------|--|
| | George Clean Car Services |

Boynton Beach F1 33426

Public Records Request No.: 16-268

724 Sw 1rd Av. Boynton Bord, Fl

02/11/2015

Page 2299

MAIL & DELIVERY SERVICES

| FedEx | 1-800-463-3339 | Account No: Drop-off box is next to Palm Beach National Bank on Worth Avenue |
|-------------|---|---|
| Post Office | 401 South County Road
West Palm Beach, FL
Tel: (561) 832-0697 | |

MAINTENANCE

| | MAINTENA | Termina |
|------------------|---|---|
| Air Conditioning | Cassidy Air Conditioning 501 Fern Street West Palm Beach, FL 33401 Tel: (561) 833-6331 | + Bob Filter Service) |
| Awnings | American Awning Company
537 Pine Terrace
West Palm Beach, FL 33405
Tel: (561) 832-7123 | Can ? |
| Cable Service | Adelphia Cable
1401 North Point Parkway
West Palm Beach, FL 33407
Tel: (561) 478-8300 | Ce 1 |
| Carpenter | Tel: | Envin Ray Cara |
| Carpet Cleaners | Stanley Steamers
Tel: (561) 586-5700 | Wall to wall 2 - Cash |
| | Merry Rugs
Tel: (561) 588-8588 | Loose rugs |
| Computers | Bloomberg
499 Rark Avenue
New York, NY 10022
Tel: (212) 318-2100 | Palm Beach consultants: Chad Bonta Peter Kapopoulos Tel: (: |

02/11/2015 Page 2300 Public Records Request No.: 16-268

TRAVEL

| Pilots | Larry Visoski | |
|---------------------|-----------------------|--|
| | Dave Rodgers | |
| | Larry Morrison | |
| Mr Epstein's planes | Jet Aviation | (561) 233-7241 |
| | | Procedure for leaving cars at the airport: Leave car at Jet Aviation landing strip Leave the keys in the car Advise Jet Aviation Tail #909JE or Tail #908JE They will tag and pull car to plane upon arrival |
| Ms Maxwell's plane | Raytheon Changed to: | 1-888-835-9782 |
| | Raytheon Changed to: | Contract No: Air 4 5 70 0 1 Tail #TA Always a Beech Jet or Hawker |
| Commercial Airlines | Air France | 1-800-237-2747 |
| | American | 1-800-433-7300 |
| | British Airways | 1-800-247-9297 |
| | Continental | 1-800-525-0280 |
| | Delta | 1-800-221-1212 |
| | South African Airways | 1-800-722-9675 |
| | United | 1-800-241-6522 |
| | US Air | 1-800-428-4322 |

- Carlos Anla Handymen (561)

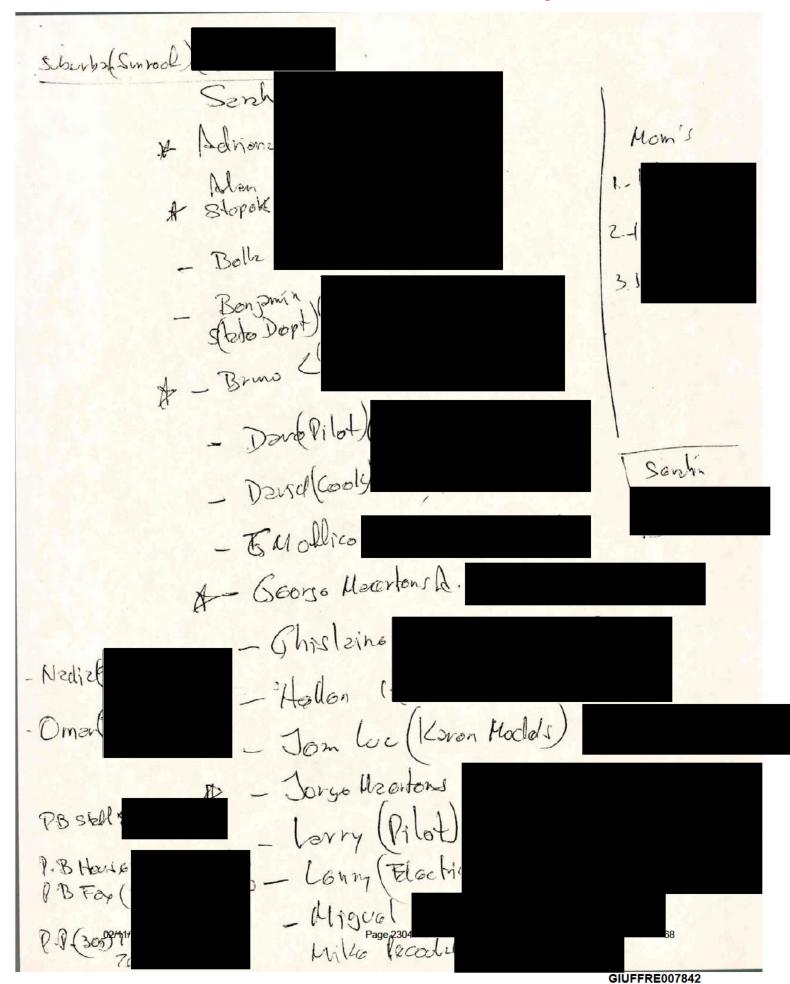
Public Records Request No.: 16-268

| | | - Benlevin |
|---|--|--|
| | BANKING | Leonor |
| Household Banking Account | 125 Worth Avenue
Palm Beach, FL 33480 | Account No: Send to Eric Gany for reconciliation \$1,000 Petty Cash Float |
| | Tel: (561) 653-5594 | La Carrie La |
| | BICYCLES | _ |
| Bicycles | Palm Beach Bicycle Trail Shop
223 Sunrise Avenue
Palm Beach, FL 33480
Tel: (561) 659-4583 | Mongoose Crossway 450 Raleigh Aluminium 300 Mercedes Benz Cignal Sports Bike Schwinn World Huffy Santa Fe Raleigh Sport Scott Boston |
| | BOOKSTORE | ES |
| Newspapers | Publix Super Market
265 Sunset Avenue
Palm Beach, FL 33480
Tel: (561) 655-4120 | |
| Magazines | Main Street News
255 Royal Poinciana Way
Palm Beach, FL 33480
Tel: (561) 833-4027 | |
| | CLEANING SER | VICE |
| Francis Peadon
House Cleaning Services | ell. 1. | Every Tuesday and Wednesday
8:00am - 4:00pm
(Francis and Pastora Peadon) |
| | INMI | ENT |
| The Breakers | One South County Road
Palm Beach, FL 33480
Tel: (561) 655-6611 | Renew car park stickers every September |
| Comedy Corner | 2000 South Dixie Highway
West Palm Beach, FL 33401 | |
| The Mar-a-Lago Club | Tel: (561) 833-1812 1100 South Ocean Boulevard Palm Beach, FL 33480 Tel: (551) 832 8688 | |
| | Tel: (561) 832-2600 | |

GIUFFRE007840

| Sem Co. Systom | 561) 715- | 4832 | Sam |
|----------------|-----------|------|-----|
|----------------|-----------|------|-----|

| Electrician | Energy Efficient Electric Tel: (561) 655-7211 | Charped. |
|--------------------|--|--|
| Exterminator | Palm Beach Exterminating Tel: (561) 689-0808 | Contact is Ken
First Monday of every month at 10:30am
Also use for termite tent |
| Garden Service | Alan Stopek Efflorescence Trace Wellington, FL 33414 | |
| | Jerome Pierre | Part-time help. Billed through Alan Stopek.
In residence: Daily from 6.30am
Not in residence: Mon - Fri from 2pm - 5pm
Also maintains Mrs Epstein's property on
Saturday mornings. |
| Garage Doors | The Doorsmith 4160 NW First Avenue Boca Raton, FL 33431 Tel: (561) 391-7768 | |
| Gates | Reich Metal Fabricators Tom Tel: (561) 585-3173 John | Back door gate switch - above garage door controls. When open, round red light is on. Front door gate switch - in telephone outlet above the kitchen telephone |
| Irrigation | Dolphin Sprinkler Inc Tel: (561) 844-8082 Janet | Blan Bontz |
| Landscape Spraying | Academy Services Tel: (561) 478-4629 | Arrange through Alan Stopek |
| Locksmith | Wilson Rowan Locksmiths
625 South Dixie Highway
West Palm Beach, FL 33401
Tel: (561) 655-3637 | |
| Painter 02/11/2015 | Page 230 | Bill Chenged 3 Public Records Request No : 16-26 |



Serehi E Mal! Address / Telephone Sheet # 358 El Brillo Way, Palm Beach Fl, 33480 Telephone/Fax Address Name Mr. Jeffrey Epstein (NYSG LLC) Office 457, Madison Avenue 4th Floor New York, NY 10021. Email Ms. Ghislaine Maxwell Email Accountants EMAD HANNA (St. Rep. Email Bella Klein-Accountants Email Petty Cesh Rep.) Assistants Leslie Groff (JE Sec) Email Cecelia Helan Kim Email Michelle Compos Email Jenn Doyla Property Keith Blumberg Email Engineer Richard Barnett DOUG of inservice? SCHOETTLE Computers Mark Lumberg Residences of Mr. Jeffrey Epstein 9 East 71st Street, New York NY 10021 Mr. Jeffrey Epstein Ms. Ghislaine Maxwell Staff House Manager Jojo House Manger Lynn Staff Phone Chef Brent Tindall Page 2305 02/11/2015 Public Records Request No.: 16-268

Home Depot 478.0783 Mon

Palm Beach Contractors

General Plumbing

Customer Service representative

Amy

561 585 2591

Electrical

Reel Power Inc

Lenny (electrician)

561 706 0827

Gates

Samco Systems

Sam (owner)

561 719 4832

Service gate switch: above garage door controls, when round light is on

Front gate switch: just above the telephone outlet kitchen area

Garage doors

The Door Smith Inc

Keith Kelly

Telephones

Southern Bell (repairs)

561 780 2355

Internal Phone system (NEC)

Repair and Programming

561 881 8118

Alarm System

Benham Industries Inc

Keith

854 491 4112

Locksmith

Wilson & Rowan

561 655 3637 The second second

A/C Maintenance

John C Cassidy

24 hr service

Handyman

Carlos (carpenter) 4villa

Palm Beach Exterminator

Landscape

Alan Stopeck

Pest Control

Kim

561 844 8082

Irrigation

Dolphin Sprinkle

561 478 4696

Pool Heating

National Pool Service

When needed

561 585 8866

Hack Pool Service

Pool Maintenance

Monday/ Thursday

561 588 7493

Tree Trimming

Country Wide Trees

Twice, summer/winter

561 371 5786

Carpet Cleaners

Stanley Steamers Merry Rug

wall to wall area rug

561 586 5700 561 588 8588

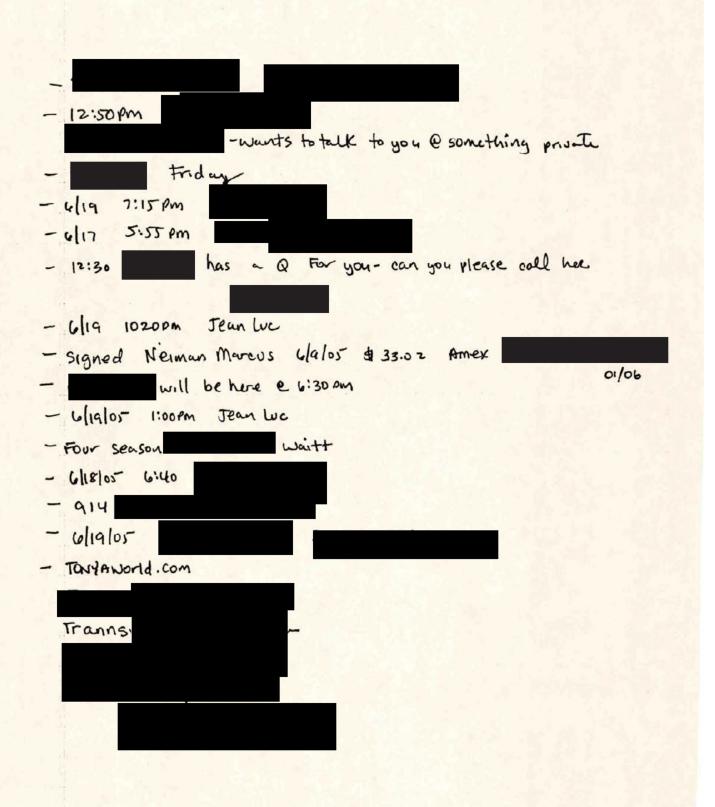
02/11/2015

Page 2306

Public Records Request No.: 16-268

| POST OFF | CE - 1.800 0 | 275.8777 | (8-12) |
|--|---------------------------------|--------------------|------------|
| Cable | 0.11 777 | 561 469-9200 (517) | 8473 |
| Adelphia cable | Cable TV | 561 468-8300 67 1 | 6.182.1000 |
| Bottled Water. | A view water | 561582 1367 | 8.083.10 |
| Bishop water company | Avion water | 301362 1307 | |
| <u>Upholsterer</u>
Frank Jennes | | 4 | |
| Gas | | | |
| Gas Energy Inc (Joe Di Gi | iovanni) all gas repairs) | 561 963 0505 | |
| Laundry equipment | , , , | | |
| May Tag | | 1800 622 4729 | |
| <u>Painter</u> | | | |
| Sam | Contact Lenny | | |
| Storage | | 561 600 5005 | |
| Storage USA | | 561 683 5835 | |
| 5580, Okeechobee Blvd | | | |
| Unit 6218 Grocery & General House | eahold items | | |
| General Grocery | Schold Heils | | |
| Publix | | | |
| 265, Sunset Ave | | 561 655 4120 | |
| Gourmet food | | | |
| C' est si bon | | | |
| 289, Sunset Blvd | | 561 659 6503 | |
| Carmines | av t. pot pv t | 661 776 0022 | |
| 2401 PGA Blvd Take 95 | | 561 775 9233 | |
| The second secon | x/ Nova sliced salmon | 561 655 6545 | |
| Green Pharmacy
151., N County Road | | 561 832 4443 | |
| Flowers | | 301 032 1113 | |
| Extra touch Flowers | | 561 835 8000 | |
| Hardware | | | |
| Home Depot | | 561 832 0783 | |
| Sewell Hardware | | 561 832 7171 | |
| 528, Clematis Street | | | |
| Newspapers Main Street News | | | |
| 255, Royal Poinciana Way | 4 | 561 833 4027 | |
| Post Office | | | |
| 401, South County Road, | | 561 832 0697 | |
| Car Detailing | George | | |
| Taxi Service/Limo | Dan Tischen | | |
| FedEx | # 114420816 (Monday & Thursday) | 1800 463 3339 | |
| Recycling | Every Thursday 6AM to 5PM | | |
| Trash collection Cars | M-F once a day Early Morning | | |
| Mercedes of Palm Beach | | 561 689 6393 | |
| Chevrolet | | 561 683 8100 | |
| TOTAL TITLE | moco 340 South County | 561 655 6645 | |
| | Auto 2600, Florida Avenue | 561 835 0809 | |
| GasolineGray Sunoco | | | |
| | | 712 0847 | |
| ALL AGUERICA | N SHUTTERS | 561-712.9882 | |

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|---|--|
| EXHIBIT 46 (Filed Under Seal) | |
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SSA-1826

ITEMIZED STATEMENT OF EARNINGS

SOCIAL SECURITY ADMINISTRATION EARNINGS RECORD INFORMATION

Date: 10/25/2016

Our records show the amount of earnings reported, not the amount of Social Security taxes that were paid.

Wages were first covered under Social Security in 1937. Therefore, 1937 is the first year for which earnings may be shown on our records. Employers were required to report earnings semi-annually in 1937, and on a quarterly basis for the years from 1938 through 1977. Beginning with 1978, employers are required to report earnings annually.

Our records do not show the exact date of employment (month and day) because we do not need this information to figure Social Security benefits. Employers do not give us this information.

Each year, there is a maximum amount of earnings that is subject to Social Security taxes and is used to compute benefits. If a person earns more than this maximum amount, the earnings statement will usually show the maximum rather than the total earnings. Maximum benefits can be found on the SSA website. http://www.ssa.gov/OACT/COLA/cbb.html

Beginning in 1951, self-employed persons could also receive Social Security credit for their work. The maximum amounts of self-employment earnings that are subject to Social Security taxes and are used to compute benefits can also be found on the SSA website. http://www.ssa.gov/OACT/COLA/cbb.html

If you have any questions, you should call, write, or visit any Social Security office. If you visit or call, please bring this letter. It will help us answer questions. The toll free number to call is 1-800-772-1213 (for the deaf or hard of hearing, call our TTY number, 1-800-325-0778).

SSA-1826 ITEMIZED STATEMENT OF EARNINGS

* * * FOR SSN XXX-XX- * * * *

FROM: SOCIAL SECURITY ADMINISTRATION

OFFICE OF CENTRAL OPERATIONS

6100 WABASH AVENUE

BALTIMORE MARYLAND 21215

NUMBER HOLDER NAME: VIRGINIA GIUFFRE

YEARS REQUESTED: 1998 THRU 2002; 2013 THRU 2015

BOIES SCHILLER AND FLEXNER 401 E LAS OLAS BLVD STE 1200 FORT LAUDERDALE FL 33301

EMPLOYER NUMBER:

KFC USA INC % PAYROLL DEPT

5200 COMMERCE CROSSING DR

LOUISVILLE KY 40229-2182

YEAR 1ST QTR 2ND QTR 3RD QTR 4TH QTR TOTAL 1999 \$140.70

EMPLOYER NUMBER:

PUBLIX SUPER MARKETS INC

PO BOX 32018

LAKELAND FL 33802-2018

YEAR 1ST QTR 2ND QTR 3RD QTR 4TH QTR TOTAL 1999 \$216.69

EMPLOYER NUMBER:

ASCENSION CHILD CARE CENTER

ASCENSION PEACE CHILD CARE CENTER

2701 N STATE ROAD 7

LAUD LAKES FL 33313-2731

YEAR 1ST QTR 2ND QTR 3RD QTR 4TH QTR TOTAL 1999 \$216.97

PAGE 1

SSA-1826 ITEMIZED STATEMENT OF EARNINGS FOR SSN

EMPLOYER NUMBER: AVICULTURAL BREEDING & RESEARCH

CENTER

% ERNEST LAKS

14201 125TH AVE N

WEST PALM BCH FL 33418-7945

YEAR 1ST QTR 2ND QTR 3RD QTR 4TH QTR TOTAL

2000

EMPLOYER NUMBER:

SOUTHEAST EMPLOYEE MANAGEMENT

COMPANY

2559 PALM DEER DR

LOXAHATCHEE FL 33470-2563

YEAR 1ST QTR 2ND QTR 3RD QTR 4TH QTR TOTAL \$3,212.44

2000

EMPLOYER NUMBER:

MAR-A-LAGO CLUB LLC TRUMP DONALD J GEN PTR

% TRUMP ORGANIZATION

1100 S OCEAN BLVD PALM BEACH FL 33480-5004

YEAR 1ST QTR 2ND QTR 3RD QTR 4TH QTR TOTAL

2000

EMPLOYER NUMBER:

OASIS OUTSOURCING VI INC 2054 VISTA PKWY STE 300

WEST PALM BCH FL 33411-6742

YEAR 1ST QTR 2ND QTR 3RD QTR 4TH QTR TOTAL \$2,037.60

2000

EMPLOYER NUMBER:

NEIMAN-MARCUS GROUP LLC

% NEIMAN MARCUS GROUP LTD SOLE MBR

1201 ELM ST

DALLAS TX 75270-2102

YEAR 1ST QTR 2ND QTR 3RD QTR TOTAL 4TH QTR \$1,440.79

2000

PAGE

\$99.48

\$1,866.50

SSA-1826 ITEMIZED STATEMENT OF EARNINGS

* * * FOR SSN

EMPLOYER NUMBER: MANNINOS INC

MANNINOS RESTAURANT

12793 B W FOREST HILL BLVD

WEST PALM BEACH FL 33414-4749

YEAR 1ST QTR 2ND QTR 3RD QTR 4TH QTR TOTAL 2001 \$212.00

EMPLOYER NUMBER: CCI OF ROYAL PALM INC % ROBERT FURR TTEE 2255 GLADES RD STE 337-W BOCA RATON FL 33431-7379

YEAR 1ST QTR 2ND QTR 3RD QTR 4TH QTR TOTAL 2002 \$403.64

EMPLOYER NUMBER:
ROADHOUSE GRILL INC
ROBERT C FURR TTEE IN BANKRUPTCY
2255 GLADES RD STE 337W
BOCA RATON FL 33431-7379

YEAR 1ST QTR 2ND QTR 3RD QTR 4TH QTR TOTAL 2002 \$1,247.90

EMPLOYER NUMBER:
MARC PINKWASSER DVM PA
13860 WELLINGTON TRCE STE 31
WELLINGTON FL 33414-8541

YEAR 1ST QTR 2ND QTR 3RD QTR 4TH QTR TOTAL 2002 \$1,561.75

EMPLOYER NUMBER:
GREAT OUTDOORS PREMIER RV-GOLF
RESORT COMMUNITY SVC ASSOC INC
145 PLANTATION DR
TITUSVILLE FL 32780-2528

YEAR 1ST QTR 2ND QTR 3RD QTR 4TH QTR TOTAL 2014 \$171.83

PAGE 3

Monday, November 7, 2016 1Quicken Data - All Accounts

Page: 1

QuickReport by Description 8/12/69 through 1/29/03

| Date | Account | Num | Payee | Memo | Category | Clr |
|-----------------------------|---|----------------------|--|------|----------------------------------|------------------|
| 5/6/02
5/6/02
5/20/02 | Courtyard Animal Hospital
Courtyard Animal Hospital
Courtyard Animal Hospital
Courtyard Animal Hospital
Courtyard Animal Hospital | 1522
1523
1541 | Virginia Roberts
VOIDvirginia Roberts
Virginia Roberts
Virginia Roberts
Virginia Roberts | | split
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Total 8/12/69 - 1/29/03

Total Inflows Total Outflows

Net Total

| Case 18-2868, Docume | ent 283, 08/09/2019, 2628241, I | Page861 of 883 |
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| E | EXHIBIT 48 ed Under Se | |
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From

Date: 2 January 2015 at 20:29

Subject: Re: URGENT - this is the statement

To: G Max < gmax1@ellmax.com>

Cc: Philip Barden < philip.barden@devonshires.co.uk>

OK G going with this, thanks Philip.

Sent from my BlackBerry® wireless device

From:

Date: Fri, 2 Jan 2015 20:14:53 +0000

To: Ross Gow<ross@acuityreputation.com>

Cc: Philip Barden<philip.barden@devonshires.co.uk>

Subject: FW: URGENT - this is the statement

Jane Doe 3 Is Virginia Roberts so not a new individual.

The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue.

The original allegations are not new and have been fully responded to and shown to be untrue

Each time the story is re told it changes with new salacious details about public figures and world leaders and now it is alleged by Ms Roberts that Alan Derschwitz is involved in having sexual relations with her, which he denies

Ms Roberts claims are obvious lies and should be treated as such and not publicised as news, as they are defamatory.



TERMINATIONS

| LAST NAME | FIRST NAME | |
|--------------|---------------|--------|
| Rinker | Ross | Box #7 |
| Rivera | Pablo | Box #3 |
| Rivera | Eduardo | Box #2 |
| Rivero | Alicia | Box #7 |
| Robbins | Jody | Box #4 |
| Roberts | Virginia | Box #4 |
| Roberts | Walter | Box #4 |
| Roberts | Diane | Box #3 |
| Robsham | Lydie | Box #7 |
| Rodriguez | Francisco | Box #4 |
| Rodriguez | Abel | Box #3 |
| Rodriguez | Kenia | Box #3 |
| Rodriguez | Aristalia | Box #2 |
| Rogers | Howard | Box #2 |
| Romeus | Melege | Box #2 |
| | | |
| Rony | Jean
Maria | Box #2 |
| Roqueta | | Box #2 |
| Rose | Cheryl | Box #2 |
| Rosenberg | Bradley | Box #2 |
| Rosier | Sandra | Box #2 |
| Rotchford | Bernadette | Box #4 |
| Rubio | Pascual | Box #2 |
| Rueda | Maria | Box #4 |
| Ruiz | Juan | Box #2 |
| Russeau | Heidi | Box #4 |
| Russell | Kathryn | Box #4 |
| Russotto | Vincent | Box #7 |
| Ryan | Megan | Box #2 |
| Ryan | Michael | Box #7 |
| Saint Gerard | Manes | Box #7 |
| Saint Surin | Jacquest | Box #2 |
| Salloum | Adib | Box #2 |
| Salman | David | Box #2 |
| Salvador | Marian | Box #2 |
| Sanford | Kevin | Box #5 |
| Santos | Elimos | Box #2 |
| Sasaki | Shoko | Box #7 |
| Saunders | Sarah | Box #2 |
| Savage | Angelia | Box #5 |
| Savoie | Terry | Box #2 |
| Scanlan | Peter | Box #5 |
| Schlechter | Melissa | Box #5 |
| Schmantowsky | Craig | Box #2 |
| Schoonover | Richard | Box #2 |
| Schroeder | Glenn | Box #5 |
| Schumacher | Patricia | Box #2 |
| Schwab | Emily | Box #2 |
| Scotland | Jaycen | Box #7 |
| Scott | Cecelia | Box #2 |
| | 100000 | _ 3X |

TERMINATIONS

| LAST NAME | FIRST NAME | |
|---------------|-------------|--------|
| Vasquez | Sosmar | Box #5 |
| Vasquez | Christian | Box #2 |
| Vaughn | Matthew | Box #2 |
| Velasquez | Rodollfo | Box #2 |
| Vidalis | Chantal | Box #2 |
| Voluck | Justin | Box #2 |
| Vyskrebentsev | Aleksey | Box #5 |
| Wahl | Steven | Box #5 |
| Walker | Sylvia | Box #7 |
| Walkowiak | Toni | Box #7 |
| Wallace | Philip | Box #2 |
| Ward | Terry | Box #5 |
| Webb | Jacob | Box #7 |
| Weber | Ronald | Box #2 |
| Weidner | James | Box #7 |
| Weisman | Brian | Box #2 |
| Wentworth | Gayle | Box #2 |
| Weslowski | Elaine | Box #2 |
| White | Scott | Box #5 |
| Whitley | Deborah | Box #7 |
| Whitney | Moriah | Box #7 |
| Whittle | Tamara | Box #2 |
| Wilburn | Jennifer | Box #2 |
| Williams | Arhon | Box #2 |
| Williams | Gretchen | Box #2 |
| Williams | Jacqueline | Box #2 |
| Williams | Ellen | Box #7 |
| Williams | Kristin | Box #7 |
| Willoughby | William | Box #2 |
| Willson | Howard | Box #5 |
| Willson | Joseph | Box #2 |
| Woolf | Elena | Box #2 |
| Wynn | Beverly | Box #2 |
| Yancey | Kathryn | Box #2 |
| Yancey | Scott | Box #7 |
| Yeskey | Dean Martin | Box #5 |
| Young | Todd | Box #2 |
| Zervoulis | Matthew | Box #2 |
| Zivkovic | Milo | Box #2 |
| Zorn | Christopher | Box #7 |
| Zwick | Danielle | Box #2 |

| Box #1 | 1998 terms |
|--------|-------------------|
| Box #2 | 1998 & 1999 terms |
| Box #3 | 1999 terms |
| Box #4 | 2000 terms |
| Box #5 | 2000 terms |
| Box #6 | 2001 terms |
| | |

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

Case No. 08-80736-Civ-Marra/Johnson

JANE DOE #1 and JANE DOE #2

| IMITER | STATES | |
|---|--------|--|
|
CIARTEN | DIAILS | |
| *************************************** | / | |

JANE DOE #3 AND JANE DOE #4's CORRECTED MOTION PURSUANT TO RULE 21 FOR JOINDER IN ACTION

through undersigned counsel, to file this motion pursuant to Federal Rule of Civil Procedure 21 to join this action, on the condition that they not re-litigate any issues already litigated by Jane Doe #1 and Jane Doe #2 (also referred to as "the current victims"). The new victims have suffered the same violations of their rights under the Crime Victims' Rights Act (CVRA) as the current victims. Accordingly, they desire to join in this action to vindicate their rights as well. Because the new victims will not re-litigate any issues previously litigated by the current victims (and because they are represented by the same legal counsel as the current victims), the Government will not be prejudiced if the Court grants the motion. The Court may "at any time" add new parties to the action, Fed. R. Civ. P. 21. Accordingly, the Court should grant the motion.

FACTUAL BACKGROUND

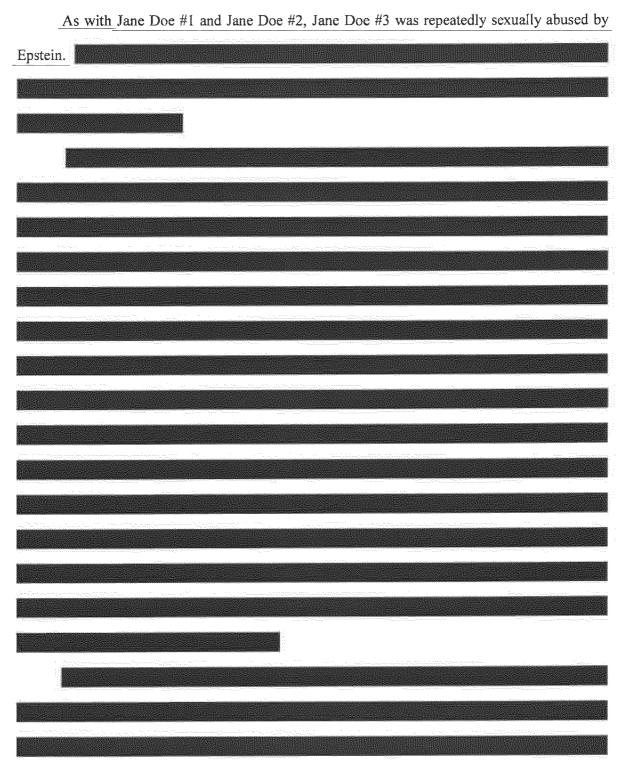
¹ As minor victims of sexual offenses, Jane Doe #3 and Jane Doe #4 desire to proceed by way of pseudonym for the same reasons that Jane Doe #1 and Jane Doe #2 proceeded in this fashion. Counsel for the new victims have made their true identities known to the Government.

As the Court is aware, more than six years ago, Jane Doe #1 filed the present action against the Government, alleging a violation of her rights under the CVRA, 18 U.S.C. § 3771. DE1. She alleged that Jeffrey Epstein had sexually abused her and that the United States had entered into a secret non-prosecution agreement (NPA) regarding those crimes in violation of her rights. At the first court hearing on the case, the Court allowed Jane Doe #2 to also join the action. Both Jane Doe #1 and Jane Doe #2 specifically argued that the government had failed to protect their CVRA rights (inter alia) to confer, to reasonable notice, and to be treated with fairness. In response, the Government argued that the CVRA rights did not apply to Jane Doe #1 and Jane Doe #2 because no federal charges had ever been filed against Jeffrey Epstein.

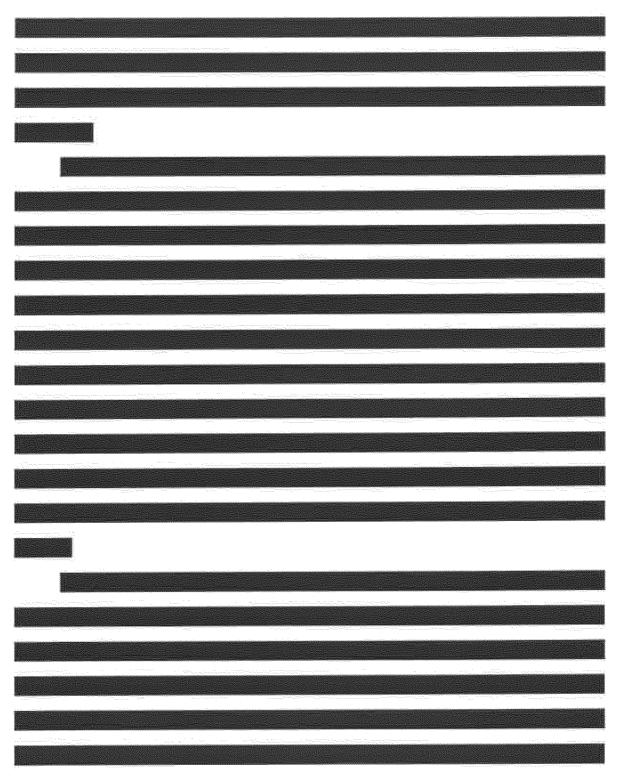
The Court has firmly rejected the United States' position. In a detailed ruling, the Court concluded that the CVRA extended rights to Jane Doe #1 and Jane Doe #2 even though federal charges were never filed. DE 189. The Court explained that because the NPA barred prosecution of crimes committed against them by Epstein, they had "standing" to assert violations of the CVRA rights. *Id.* The Court deferred ruling on whether the two victims would be entitled to relief, pending development of a fuller evidentiary record. *Id.*

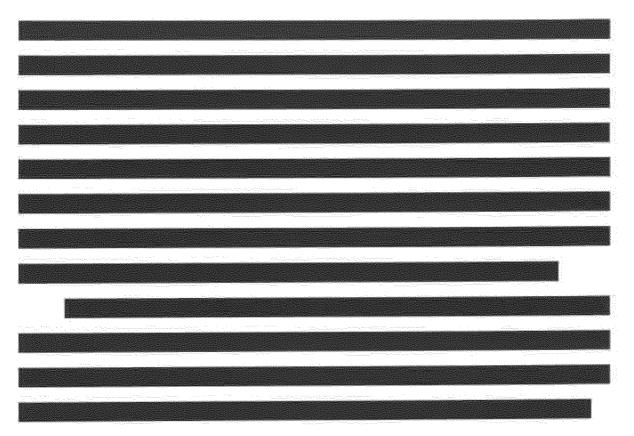
Two other victims, who are in many respects similarly situated to the current victims, now wish to join this action. The new victims joining at this stage will not cause any delay and their joinder in this case is the most expeditious manner in which to pursue their rights. Because the background regarding their abuse is relevant to the Court's assessment of whether to allow them to join, their circumstances are recounted here briefly.

Jane Doe #3's Circumstances









The Government was well aware of Jane Doe #3 when it was negotiating the NPA, as it listed her as a victim in the attachment to the NPA. Moreover, even a rudimentary investigation of Jane Doe #3's relationship to Epstein would have revealed the fact that she had been trafficked throughout the United States and internationally for sexual purposes. Nonetheless, the Government secretly negotiated a non-prosecution agreement with Epstein precluding any Federal prosecution in the Southern District of Florida of Epstein and his co-conspirators. As with Jane Doe #1, and Jane Doe #2, the Government concealed the non-prosecution agreement from Jane Doe #3 – all in violation of her rights under the CVRA – to avoid Jane Doe #3 from raising powerful objections to the NPA that would have shed tremendous public light on Epstein

and other powerful individuals and that would likely have been prevented it from being concluded in the secretive manner in which it was.

Jane Doe #4's Circumstances

If permitted to join this action, Jane Doe #4 would allege, and could prove at trial, that she has CVRA claims similar to those advanced by Jane Doe #1 and Jane Doe #2, based on the following:

As with the other Jane Does, Jane Doe #4 was repeatedly sexually abused by Epstein. In or around the summer of 2002, Jane Doe #4, an economically poor and vulnerable sixteen-year-old child, was told by another one of Epstein's underage minor sex abuse victims, that she could make \$300 cash by giving an old man a massage on Palm Beach. An acquaintance of Jane Doe #4 (also a minor sexual abuse victim of Epstein) telephoned Epstein and scheduled Jane Doe #4 to go to Epstein's house to give him a massage. During that call, Epstein himself got on the phone (a means of interstate communication) with Jane Doe #4, asking her personally to come to his mansion in Palm Beach.

Jane Doe #4 then went to Epstein's mansion and was escorted upstairs to Epstein's large bathroom by one of Epstein's assistants. Shortly thereafter Jeffrey Epstein emerged and lay face down on the table and told Jane Doe #4 to start massaging him. Epstein asked Jane Doe #3 her age and she told him she had recently turned sixteen. Epstein subsequently committed illegal sexual acts against Jane Doe #4 on many occasions.

Epstein used a means of interstate communication (i.e., a cell phone) to arrange for these sexual encounters. Epstein also frequently travelled in interstate commerce (i.e., on his personal jet) for purposes of illegally sexually abusing Jane Doe #4.

The acts Epstein committed against Jane Doe #4, constituted numerous federal sex offenses, some of which do not carry a statute of limitations and thus are not time-barred. See 18 U.S.C. § 3283. And these offenses were the kinds of offenses that the Federal Bureau of Investigation (FBI) and U.S. Attorney's Office for the Southern District of Florida were pursuing in 2007. So far as Jane Doe #4 is aware, the U.S. Attorney's Office made no serious effort to locate her. Instead, after identifying approximately forty separate underage sexually abused victims, and apparently preparing a 53-page federal indictment and with full awareness of the existence of many victims like Jane Doe #4 – unidentified and not interviewed – it entered into a non-prosecution agreement barring prosecution of Epstein's federal crimes against these victims. This is contrary to the Government's normal approach in prosecuting federal sex offenses. It also violated Jane Doe #4's rights under the CVRA, including the fact that she had a "reasonable" right to confer with the U.S. Attorney's Office before they entered into an agreement with a sex offender barring prosecution of him for the crimes he committed against her. 18 U.S.C. § 3771(a)(5).

MOTION FOR JOINDER

Jane Doe #3 and Jane Doe #4 now both move to join this action filed by Jane Doe #1 and Jane Doe #2, pursuant to Rule 21 of the Federal Rules of Civil Procedure. Rule 21 provides that "[o]n motion or on its own, the court may at any time, on just terms, add . . . a party." Rule 21 "grants the court broad discretion to permit a change in the parties at any stage of a litigation."

Ford v. Air Line Pilots Ass'n Int'l, 268 F. Supp. 2d 271, 295 (E.D.N.Y. 2003) (internal quotation omitted). The new victims should be allowed to join the current victims in this action under Rule 21.

The new victims will establish at trial that the Government violated their CVRA rights in the same way as it violated the rights of the other victims. The new victims' participation in this case is important because it appears that the Government intends to raise a factual defense that somehow it did keep Jane Doe #1 and Jane Doe #2 properly informed of what was happening in the criminal prosecution. Of course, if four victims all testify consistently that they were not properly informed by the Government (as we believe they will), that provides a stronger case for a CVRA violation.

In addition, Jane Doe #3 and Jane Doe #4's participation is relevant to a defense the Court has allowed the Government to raise. The Court has previously ruled that the victims' request for rescission of the NPA "implicates a fact-sensitive equitable defense which must be considered in the historical factual context of the entire interface between Epstein, the relevant prosecutorial authorities and the federal offense victims – including an assessment of the allegation of a deliberate conspiracy between Epstein and federal prosecutors to keep the victims in the dark on the pendency of negotiations between Epstein and federal authorities until well after the fact and presentation of the non-prosecution agreement to them as *a fait accompli*." DE 189 at 12 n.6 (emphasis added). Jane Doe #3's and Jane Doe #4's participation in this case will help to show what the "entire interface" was between the Government and the victims and thus to respond to the Government's estoppel arguments as well as other defenses that it appears to be preparing to raise. *See, e.g.*, DE 62 (52-page response from the Government to the victim's summary judgment motion, raising numerous factually-based and other arguments against the victim's position).

Jane Doe #3's and Jane Doe #4's participation is also directly relevant to the discovery disputes currently pending in this case. The Government has raised various relevancy objections to the documents that Jane Doe #1 and Jane Doe #2 are attempting to obtain. The current victims have responded by explaining how these documents are relevant, including explaining how these documents might bear on the way in which Epstein used his powerful political and social connections to secure a favorable plea deal, as well as provide proof of the Government's motive to deliberately fail to investigate certain aspects of the victims' claims in an effort to maintain the secrecy of the facts and resolve the case without the victims' knowledge. *See, e.g.,* DE 266 at 6-10. Jane Doe #3 and Jane Doe #4's participation will help prove the relevancy of these requests, as well as the need for those requests.

One clear example is Request for Production No. 8, which seeks documents regarding Epstein's lobbying efforts to persuade the Government to give him a more favorable plea arrangement and/or non-prosecution agreement, including efforts on his behalf by Prince Andrew and former Harvard Law Professor Alan Dershowitz. Jane Doe #1 and Jane Doe #2 have alleged these materials are needed to prove their allegations that, after Epstein signed the non-prosecution agreement, his performance was delayed while he used his significant social and political connections to lobby the Justice Department to obtain a more favorable plea deal. *See, e.g.,* DE 225 at 7-8 (discussing DE 48 at 16-18). Jane Doe #3 has directly person knowledge of Epstein's connection with some of these powerful people and thus how Epstein might have used them to secure favorable treatment.

Adding two new victims to this case will not delay any of the proceedings. They will simply join in motions that the current victims were going to file in any event. For example, the

new victims will simply join in a single summary judgment motion that the current victims anticipate filing after discovery has been completed.

Nor will adding the new victims prejudice the United States. As the court is aware, this Court is still in its initial discovery stage. The Court is currently considering whether to reject the Government's assertion of privilege over documents regarding the case. See DE 265 (victims' reassertion of objections to the Government privilege claims). The new victims do not seek any additional discovery beyond that previously sought by the current victims.² Accordingly, the United States will not be prejudiced or burdened by adding them to this case.

The CVRA does not contain any statute of limitations for filing an action to enforce rights under the statute. Accordingly, were the Court to deny this motion, the result might be that the new victims would then be forced to file a separate suit raising their claims, which would then possibly proceed on a separate litigation track. Rather than require duplicative litigation, the Court should simply grant their motion to join.

Jane Doe #1 and Jane Doe #2 support the joinder motion. Counsel for the victims have discussed this motion with the Government at length in an effort to avoid any need to file a substantive pleading on the issue. Counsel for the victims asked the Government during the summer for its position on joinder. The Government, however, took the matter under advisement for months. Ultimately, after several inquiries from victims counsel, the Government indicated without explanation that it opposes this motion. Counsel for the victims has requested a meeting with the Government on this issue, which will hopefully occur in

² Jane Doe #3 and Jane Doe #4 have asked the Government to provide them with the record of their statements that they provided to the FBI. These FBI 302's should be only a few pages long.

January. In the meantime, however, counsel for the victims believe that it is no longer appropriate to delay filing this motion and accordingly file it at this time. Because the Government is apparently opposing this motion, Jane Doe #3 and Jane Doe #4 have described the circumstances surrounding their claims so that the Court has appropriate information to rule on the motion.

CONCLUSION

Jane Doe #3 and Jane Doe #4 should be allowed to join this action, pursuant to Rule 21 of the Federal Rules of Civil Procedure. Their joinder should be conditioned on the requirement that they not re-litigate any issues previously litigated by Jane Doe #1 and Jane Doe #2. A proposed order to that effect is attached to this pleading.

DATED: January 2, 2015

Respectfully Submitted,

/s/ Bradley J. Edwards
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This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah

CERTIFICATE OF SERVICE

I certify that the foregoing document was served on January 2, 2015, on the following using

the Court's CM/ECF system:

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